

Ahmer Nizam:

I will not be able to attend the workshop and would like offer the following comments:

New Section: WAC 480-62-X1.8

The BLMR and PCC feel that the Federal Standards fully cover any safety issues as related to speed and we feel that the commission does not need to or as stated in federal statute be able to regulate train speed. This process will be very costly to the shortline railroads in the State and would be very burdensome on shortline resources.

WAC480-62-X2.6

We would like added to the section wording to require the highway authority to not change the grade or profile of the roadway to put the railroad in a hole lower than the current road grade and that the highway authority require its employees or contractors to profile the road to meet the existing railway grade and if the highway authority elects to change the grade between the railroad and the roadway that the highway authority must compensate the railroad for any and all repairs or changes in the railroad/ highway crossing surface.

WAC 480-62-080

We feel the commission is again being over zealous in its regulations and the requirement exceed what is required by federal statute.

It is un-reasonable to have a report made in 10 minuets as small railroad do not have the same amount of personnel as larger railroads and in the case of a crossing accident the manager investigating the incident is also the manager who must make these reports, we feel that 24 hours except in the case of a release of hazardous materials would be a fair time to report these incidents.

In the case of a crossing accident we notify the local emergency authorities as soon as the event happens and we feel FRA does not require a notice when a person is injured or given 1st aid in a crossing accident and that FRA receives notice only in the monthly reports and wee feel the commission should delete section C of paragraph 1.

In the case of property damage section D, the commission should raise the report threshold to the FRA minimum.

Thank you for your consideration.

**Dave Buccolo
VP Railroad Operations**