

February 25, 2003

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Marylin Showalter, Chairwoman
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

RE: Docket #TR-021465

Dear Ms. Showalter,

I am writing to express my concerns regarding the unregulated use of remote control locomotives on the BNSF and other railroads. I have worked for the BNSF for nearly 25 years and have always been receptive to positive change. However, I believe remotes are being used in ways they were never intended to be.

Just to name a few recent incidents, on Monday evening, February 3, at the north end of Interbay yard, an unoccupied remote engine with 21 cars went past a red absolute signal, through an automatic switch lined against it, and proceeded out onto the main line. The remote operators still did not see their mistake, and sent the radio signal for the engine to back up. As it backed up, a car was derailed on the main line and five cars were derailed at a crossover to the adjacent track. Northbound Amtrak was less than a minute away, but because of a dispatcher warning system, and the pure luck of timing, the Fort Worth dispatcher was able to notify the Amtrak engineer in time to stop at Galer St. I shudder to think what would have happened had the timing been ever so slightly different.

On February 16, a CSX switchman in New York was killed when he was struck by a boxcar while another switchman was operating the remote engine.

On February 22, a switchman at South Seattle Metro treatment plant operating a remote controlled engine shoved a chlorine tank car off the end of the track into the back of the building, miraculously without puncturing the tank car. If the car had been punctured and chlorine gases had escaped, fatalities may have resulted.

I am not against remote control technology as it was designed to be

implemented. The yards where remote control locomotives (RCLs) work well are large yards where long movements can be protected by "remote zones" where no autos, people, switches, or other railroad traffic is present. Seattle has three small yards, two in very densely populated areas, and one in Tukwila with direct access to the main line at both ends. As I write this, at both South Seattle and Interbay yards, locomotives are being operated by two ground employees, and at many times during the shift the engine is moving ahead with no one on it.

In order to expedite the work, and to make it feasible with only two crew members, it is common practice to "protect the point," or the direction of the movement, by placing oneself in a position to see ahead of the movement while on the ground, without occupying the engine or preceding the movement on foot. If the way is "seen to be clear," the movement may then proceed. The engine typically is pulling out into areas where signals, other train traffic, switches lined improperly, or the general public may be present. RCLs were not intended to be operated in these environments.

Seven communities in the U.S. have banned remote control use until further studies and regulations can be established, including Detroit, Boston and Cleveland. I hope you will recognize the need for mandatory rules governing their use. Railroads all over the country like to cite a study claiming that RCLs improve safety, but the study was done unscientifically with insufficient and questionable data. I am also greatly concerned that railroads are not reporting all the remote incidents, as is required by the FRA. Who is monitoring their compliance?

I am also worried for the safety of my husband, who is a conductor on the Sounder commuter trains, and all his passengers. How long before another remote engine enters the mainline without authority? How long will the railroads' luck hold out?

Respectfully,

Nancy Delacour