

February 24, 2003

TO: Washington Utilities & Transportation Commission

VIA: E-mail [record@wutc.wa.gov](mailto:record@wutc.wa.gov)

**DOCKET #TR-021465**

FROM: Herald Ugles, Vice President

International Longshore & Warehouse Union, Local #19

**RE: Remote Control Locomotive Operations**

Dear Sirs:

I am writing on behalf of ILWU Local 19, Seattle to state our feelings on the use of the remote control locomotives (RCL).

As per your notice of Jan. 31, 2003 we will comment on Item #3 & 4.

We feel the lack of training and the fact that operators of RCL do not have to be licensed locomotive engineers creates a very dangerous work environment.

It is noted under FRA Safety Advisory 2001-01, the FRA stated that there needs to be additional training for engineers to do the switching because they lack the valuable experience gained from working around moving equipment and less likely to recognize dangerous situations.

On that note the same should be true for the new people the railroads are training to use the RCL. They should be required to do the full training that it takes to become a licensed engineer, then they will understand the full dynamics of operating a locomotive and get the "feel" of train movements of starting and stopping.

When an engineer is in the seat of the locomotive he acquires a "feel" for the train and can sense if there is problems. When you are on the ground next to the train with a RCL box you have no feel or sense of a problem until the train comes to a sudden stop.

We also feel the railroads have not done enough to set-up safeguards to protect our workers and the public from unmanned trains. They have not fenced off the entire areas where the RCL are to be used and have not installed derails to be used to prevent runaways.

Years ago a company we worked for, Cargill Inc., used RCL at Pier 86 for the spotting of grain cars. They quit using it after we had an incident where a runaway locomotive went onto the BN mainline and fouled the track.

We feel at this time it would create an unsafe working environment for our workers and the public if railroads were given a blanket use of RCL. The FRA needs to lay down strict guidelines and regulations to ensure the safe use of the RCL or ban them if such guidelines and regulations cannot be followed.

Sincerely,

I.L.W.U. LOCAL #19

Herald Ugles  
Vice President

cc: Michael Elliott  
1<sup>st</sup> Vice Chairman BLE  
4714 N. Cedar St.  
Spokane, WA 99205

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cc: WA Utilities Comm Feb 2003