

Brotherhood of Locomotive Engineers and Trainmen

Washington State Legislative Board

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March 15, 2004

Carole J. Washburn, Commission Secretary

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Drive, S.W., P.O. Box 47250

Olympia, WA. 98504-7250

Re: Docket No. TR-040151

Sent VIA Electronic Transfer Format

Dear Commissioners:

The Washington State Legislative Board, Brotherhood of Locomotive Engineers and Trainmen, appreciate the opportunity to provide comments on the proposed rulemaking to "Consider Possible Rules in Chapter 480-62 WAC, Railroad Operation Rules Relating to Point Protection."

During the workshop process under Docket No. TR-021465, all stakeholders participated in a comprehensive discussion of point protection issues as related to railroad Remote Control Operations in particular and railroad operation generally. As the discussion progressed, it became apparent that the issue of point protection was viewed by many as not only central to Remote Control Operations, but central to General Railroad Operations as well. Recognizing the public concerns voiced in the workshop and hearing process, the WSLB-BLET is in agreement with Commission staff on draft language as outlined in the Notice of Opportunity to File Written Comments (Service Date February 20, 2004).

All four (4) points in the draft proposal are crafted in accordance with the Railroads own operating rules (see General Code of Operating Rules). As the Railroads are "masters of their own rules," and they purport to abide by those rules, there can be no assertion that these rules impose any new cost to railroad operations. At the same time, these four rules will positively address the accidents, incidents, and injuries documented in the extensive rulemaking process undertaken by the Washington Utilities and Transportation Commission.

*A DIVISION OF THE RAIL CONFERENCE OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS
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The WSLB-BLET wholeheartedly supports the Washington Utilities and Transportation Commission in establishing rules relating to general point protection. Thank you for the opportunity to participate in this important public safety issue.

Respectfully submitted,

Mark K. Ricci, Ph.D., Chairman
WSLB-BLET

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