

February 27, 2003

From: Terry Reddish
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To: Washington Utilities and Transportation Commission

Subject: Comments on specific dangers that exist with RCL operations but not with operations which include locomotives occupied by a certified engineer.

There are at least four specific dangers that are present when a locomotive is not controlled by a locomotive engineer occupying the cab of the locomotive. Those dangers are:

1. It eliminates an employee from being at the locomotive end of all reverse movements and thereby be able to assure at all times that there is no conflicting movement or pedestrians in the way of the movement.
2. It eliminates an employee from being in physical control of the locomotive should an emergency situation develop, such as radio interference, radio controller malfunction or deliberate sabotage.
3. It forces the employee operating the remote controller to multitask under widely varying, sometimes stressful and distracting conditions. This person must now not only read switch lists, monitor and answer his/her portable radio, line switches, pull coupling levers, be aware of distances to cars in tracks and obstructions such as tracks to out to foul on adjacent tracks as well as other possible switch engines in the yard but be aware also of how fast the locomotive is going, whether it is braking fast enough for the situation, if the wheels are sliding and if there are conflicting movements behind or near it. This is being expected of this individual under conditions that will include carrying switch lists, a lantern, a radio and a radio controller belt pack, while wearing safety glasses which during periods of rain are constantly visually impaired with beads of water.
4. The locomotive engineer acts as the safety net on the crew, observing what the ground employees are doing and assuring that the locomotive does not imperil the lives of those employees as they perform their tasks. Taking that individual out of the process removes that important level of safety.