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UPS Next Day Air

April 28, 1999

Carole J. Washburn, Executive Secretary
Washington Utilities & Transportation Comm'n
P.O. Box 47250
1300 S. Evergreen Park Drive, S.W.
Olympia, Washington 98504-7250

Re: Railroad Company Operations Rulemaking
Docket No. TR-981102

Dear Ms. Washburn:

Please find enclosed the original and ten copies of United Transportation Union's Comments for filing in the above-captioned matter. In accordance with the Commission's request we have also enclosed a diskette in WordPerfect format.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "D.R. Elliott, III".

Daniel R. Elliott, III
Assistant General Counsel

cc: C. J. Miller, III, General Counsel
T. Retterath, Washington State Director

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**Before the
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

**RAILROAD COMPANY
OPERATIONS RULEMAKING**

**CHAPTER 480-62 WAC
DOCKET NO. TR-981102**

UNITED TRANSPORTATION UNION'S COMMENTS

United Transportation Union ("UTU") respectfully submits its comments pursuant to the Washington Utilities and Transportation Commission's April 1, 1999 letter, regarding the proposed railroad company operations rulemaking. UTU would like to receive all future information regarding this rulemaking at the two addresses on the signature page.

At this time, UTU would like to express its total opposition to any rule which would permit or promote remote control train operations in Washington. The Federal Railroad Administration's ("FRA") most recent position on this matter was stated February 1997, when that agency required the Wisconsin Central Transportation Corporation to refrain from all remote control operations, except for use in industrial plants. UTU, as the FRA expressed in its order, also has some serious concerns about the safety problems these train operations have caused in the past.


For example, on or about May 4, 1998, a welder was killed in Little Rock, Arkansas, when a remote control train struck a railroad car under which he was working. This was the ninth fatality classified as Power Haulage by the Mine Safety and Health Administration as of that date in 1998. There were 13 Power Haulage fatalities in the same period in 1997.

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As this example demonstrates, these remote control operations are inherently dangerous. The carriers claim this job elimination increases efficiency. However, the carriers fail to address the cost of this supposed efficiency which is the lives and safety of the railroad workers and members of the public who work around or find themselves near these remote control trains.

In conclusion, the United Transportation Union opposes any efforts by rule or otherwise to make remote control train operations legal or permissible in the State of Washington.

Respectfully submitted,



Daniel R. Elliott, III
Assistant General Counsel
United Transportation Union
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Tom R. Retterath
Washington State Legislative Director
United Transportation Union
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