

TR-981102

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Puget Sound & Pacific Railroad
P.O. Box 1, 2
Elma, WA 98541
(360) 482-4994
Fax (360) 482-3966
E-mail: psap@techline.com



Washington Utilities &
Transportation Commission
Ahmer Nizam
P.O. Box 47250
Olympia, WA 98504-7250

RECEIVED
REGISTRATION DIVISION
00 OCT 16 PM 4:27
STATE OF WASH.
UTIL. AND TRANSP.
DIVISION

October 16, 2000

Dear Mr. Nizam:

Following are our comments to the draft of railroad operations rules.

X1.3 – No Change

X1.4 –No Change

X1.4 – No Change

X1.7 –No Change

X1.8 –No Change

X1.9 –No Change

X2.1 – Follow FRA Title 49 Regulations

X2.2 – No Change same as X2.1

X2.3 – No Change

X2.5 – No Change

X2.6 – 1.6 – What is the agreed maximum distance between 2 or more tracks.

Description needs to be more definitive

2.a – Should be for new construction only

2.b – O.K.

3.a – Railroad needs to have right to agree and a standard set

3.b – O.K.

4. – Who determines standards for maintenance & repair

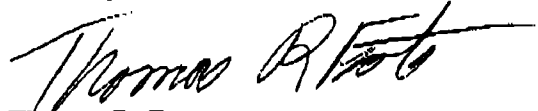
- 4.f – Citizens complaints could cause liability to railroads based upon shared responsibility
- 5. – O.K.

X3.5 – 2. - Eliminate listing affected xings as they are treated the same as a manual Operation

- 3. – Allow existing remote control operations to be exempt from this new rule as they have previously reported their operation.

Any Questions, please call me.

Sincerely,



Thomas R. Foster
Vice President/General Managr

Cc: David L. Parkinson
Thomas L. Schlosser