

Re: Remote Control Locomotive Operations / Docket No. TR-021465

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The carriers (UPRR & BNSF) have implied that the GCOR would be the safety net for RCL operations. Do we know that the GCOR is being used for those purposes?

The FRA can only respond to those incidents that are reported to them by the carriers or other interested parties. Generally well after the fact, with the facts that are provided to them. We know that the recommendations carrier very little weight and are symbolic at best.

As of September 2003 the UPRR has had 28 (Known) derailments on the Portland Service Unit with remote control locomotives at a cost of \$100,000 to the equipment. Causation has been implicated by the carrier to be **100% human error!**

RCL technology does fail, by design, communication failures between man and locomotive, insufficient training, failed remote units being available for use, new technology placed on aged locomotives, one man remote crews, two man crews with one remote, two man remote crews with an additional man (bobble heads) positioned in some locomotives to protect public crossings-not equipped with a remote, rumored bypasses on locomotives in order to get them into operation, on board locomotive radio failures, communication failures due to geographies and obstructions, communication failures due to other high powered transmissions in the area, multi tasking of operators, point protections, production decreases, etc...

This Division of the Brotherhood of Engineers supports your review, oversight, and rule making for the "SAFE" operations of RCL's within our State and local communities.

Thank You for your considerations!