

# *Brotherhood of Locomotive Engineers and Trainmen*

## **Washington State Legislative Board**

[www.wslb-ble.org](http://www.wslb-ble.org)

**Mark K. Ricci, Ph.D., Chairman**

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March 8, 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 # 021465

**Sent VIA Electronic Transfer Format**

Dear Commissioners:

The Washington State Legislative Board, Brotherhood of Locomotive Engineers and Trainmen appreciate the opportunity to provide final comments on Proposed Rulemaking (CR-102) in this docket now filed with the Code Reviser.

For over a year, stakeholders have participated in a comprehensive discussion of Remote Control Locomotive Operations in Washington State. Over this period of time, multiple discussion drafts of RCL rules evolved into what was submitted to the Washington Utilities and Transportation Commission for consideration. The first part of the draft rules address Remote Control Locomotive definitions, amendments to existing railroad reporting rules regarding Remote Control Operations, and railroad reporting rules relating to the use of cameras for point protection at crossings. These rules address only technical flaws discovered in the original remote control regulation in effect since 2001.

It is the opinion of the WSLB-BLET that these rules do not fully address public concerns as expressed at the various workshops and in the docket of TR-021465.

With regard to draft rules points 4 and 5, the WSLB-BLET respectfully disagrees with their removal from the proposed rules. Proposed rule 4 directly addresses the inherent dangers associated with Remote Control Operations over public crossings. Proposed rule

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5 directly addresses point protection where a remote control locomotive operation could enter or foul the main line. With numerous documented accidents, incidents, derailments, and a runaway Remote Control Locomotive wreck, clearly, “point protection” rules are essential in any public safety discussion of Remote Control Locomotive Operations.

The WSLB-BLET has provided Commission staff with extensive information on all facets of Remote Control Locomotive Operations. It is our sincere desire that the Commission adopt effective rules for protecting the public and railroad workers. Thank you for the opportunity to participate in this important public safety issue.

Respectfully submitted,

Mark K. Ricci, Ph.D., Chairman

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