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STATE OF OREGON  
UTIL. AND TRANSP.  
COMMISSION

May 20, 2004

VIA FAX AND U.S. MAIL

Carole J. Washburn  
Washington Utilities and Transportation Commission  
1300 E. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: Point Protection Rulemaking  
Docket No. TR-040151

Dear Ms. Washburn:

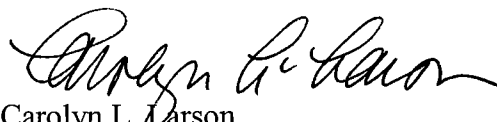
On May 12, 2004, the Commission heard testimony from the WUTC staff, Burlington Northern Santa Fe (BNSF), Union Pacific Railroad Company (UP) and representatives of the United Transportation Union (UTU) and Brotherhood of Locomotive Engineers (BLE) about proposed point protection rules.

As part of the railroads' testimony, UP told the Commission it had amended GCOR rule 6.5 in its System Special Instructions dated April 1, 2004. In subsequent testimony, BLE representative Mark Ricci testified that he had spoken with locomotive engineers at a BLE convention, who stated that they were unaware of any such rule change.

To eliminate any doubt as to whether UP did in fact change GCOR 6.5, I am attaching hereto excerpts from the April 1, 2004 System Special Instructions, confirming UP's implementation not only of the revision to GCOR 6.5, but also the addition of the RCL rules mentioned in UP's testimony.

Very truly yours,

KILMER, VOORHEES & LAURICK, P.C.



Carolyn L. Larson  
Attorney for Union Pacific Railroad Company

CLL:hvw  
Enclosure

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BUILDING AMERICA<sup>SM</sup>

UNION PACIFIC RAILROAD  
REVISED  
SYSTEM SPECIAL INSTRUCTIONS

**Effective 0001 Thursday, April 1, 2004**

D. J. Duffy, Executive Vice President - Operations  
J. H. Koch, Vice President - Transportation  
S. R. Barkley, Vice President - Southern Region  
M. F. Kelly, Vice President - Northern Region  
T. F. Jacobi, Vice President - Western Region  
J. M. Santamaria, Vice President - Central Region  
W. E. Wimmer, Vice President - Engineering  
D. H. Jacobson, Vice President - Operating Service  
R. S. Blackburn, Vice President - Premium & Intermodal Operations  
S. J. McLaughlin, Vice President - Quality & Process Improvement  
R. M. Grimaila, Sr. AVP - Safety, Environmental & Security  
M. M. Connolly, AVP - Harriman Dispatching Center  
B. M. Kanuch, Chief Mechanical Officer  
T. R. Lewis, General Manager - Operating Practices

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**This document supersedes:**

Union Pacific Railroad Revised System  
Special Instructions, effective April 6, 2003

- On track bulletins and on track warrants that do not convey movement authority, passenger trains may be identified by schedule number.
- 5.13 Blue Signal Protection Of Workmen**  
**Change Part B.1. to read:**  
 Each manually operated switch, including any facing point crossover switch that provides direct access must be lined against movement onto the track and secured by an effective locking device. A blue signal must be placed at or near each such switch.
- Change Part C., Step 2 to read:**  
 2. A Blue Signal must be visible to the engineer or employee controlling the engine. On engines equipped for remote control operations, the control must not be in remote and must be in manual. A blue tag must be placed on the switch governing remote/manual operation.
- 5.16 Observe and Call Signals**  
**Delete entire rule.**
- 6.3 Main Track Authorization**  
**Add a new bullet reading:**  
 • Rule 9.14.2 Controlled Block System (CBS)  
**Add the following paragraph:**  
**Joint Authority**  
 When a train receives track and time, track warrant, track permit, or DTC authority joint with an employee, the train must not occupy the joint limits until:
- Permission is received to enter the joint limits from the employees listed on the authority.
  - or
  - Advice is received from the train dispatcher that the employees have reported clear of the limits.
- 6.4 Reverse Movements**  
**Change rule to read as follows:**  
 Make reverse movements on any main track, controlled siding, or on any track where a block signal system is in effect at restricted speed and only within the limits a train has authority to occupy the track.
- 6.4.1 Permission for Reverse Movements**  
**Change rule to read as follows:**  
 Obtain permission from the train dispatcher or control operator before making a reverse movement, unless the movement is within the same signaled block.
- When a train or engine is advised that working limits have been established behind their train, obtain permission from the employee in charge to make any reverse movements, including within the same signaled block.
- 6.4.2 Reverse Movements Within Control Points Or Interlockings**  
**Change Part A (Control Point or Manual Interlockings) to read:**  
 Control Points Outside Manual Interlockings.  
 Except within track and time limits, if movement stops while the trailing end is between the outer opposing absolute signals of a control point, the movement must not change direction without permission from the control operator
- Manual Interlockings  
 If movement stops while the trailing end is between the outer opposing absolute signals of a manual interlocking, the movement must not change direction without permission from the control operator.
- 6.5 Handling Cars Ahead of Engine.**  
**Change first paragraph to read as follows:**  
 When cars or engines are shoved and conditions require, a crew member must provide protection for the movement. Cars or engines must not be shoved to block other tracks until it is safe to do so.
- 6.6 Picking Up Crew Member**  
 This rule does not apply on UPRR.
- 6.10 Calling Attention to Restrictions**  
**Delete entire rule.**
- 6.11 Spacing Trains**  
**Delete entire rule.**

**Item 10-C. Air Brake & Train Handling Rules, Chapters 30 to 39****35.0 Remote Control of Locomotives**  
Add new rules 35.1 through 35.6.4 as follows:**35.1 Remote Control Operating Instructions****35.1.1 Employees assigned to Remote Control Crew**

Employees assigned to a remote control crew are governed by these instructions and must have a current copy accessible while on duty.

Remote control operators (RCO) will be issued an operator's manual, which governs the operation of a remote control system.

Remote control operators are issued equipment, including a special vest to hold the remote control transmitter, lights and/or other equipment to assist in the performance of their duties. Each RCO must have in their possession an operative, holstered hand-held radio equipped with a wired microphone. This equipment must be used for the intended purpose and as designed by the manufacturer.

Remote Control Transmitters are considered a safety device. Employees are prohibited from tampering with or disabling any remote control transmitter or safety feature except as provided for in RCO rules. Employees are prohibited from knowingly using a remote control transmitter with a disabled safety device.

All rules or instructions contained in other company publications will remain in effect unless specifically exempted in these instructions.

**35.1.2 Job Briefing**

Before operating a remote control locomotive, a job briefing must be conducted including all crew members. All remote control crew members must be informed and clearly understand which crew member will be controlling the movement.

**35.1.3 Going Between Equipment**

A crew member must not go under or between cars coupled to a remote control locomotive or when a remote control locomotive is on the same track until each member of the crew has been informed of the work to be performed. The primary RCO must ensure that the remote control transmitter's speed control is in the stop position, the directional control is in neutral, and the air brakes are applied. Each remote control operator must acknowledge that he/she understands that another employee will be going between equipment by announcing via radio "set and centered." The speed control, direction control, and air brakes must not be repositioned on the remote control transmitter or control of the remote control transmitter transferred to another operator until each crew member has advised the Primary RCO that they are "in the clear."

**35.1.4 Shoving Movement**

Except when the primary RCO is riding the leading locomotive, remote control movements are to be considered "shoving" movements, regardless of direction or position of remote control locomotive.

**35.1.5 Remote Control Mode**

Each locomotive in the remote control consist must have a tag placed on the control stand indicating the locomotive is being used in a remote control mode. The tag must be removed when the locomotive is placed in manual mode.

**35.1.6 Road Crossing Equipped with Cameras**

When movements are made over a road crossing equipped with cameras, unless the RCO is on the engine or a crew member is at the crossing to provide warning, the RCO must:

- Be in position to observe the crossing and roadway approaches in the monitor to assure that automatic crossing warning devices activate as designed when the RCL approaches and remain activated until the crossing is occupied by engine or cars;
- Make sure movement over crossing does not exceed 4 MPH until crossing is occupied.

### 35.2 Setup and Testing

Prior to operating a remote control system, the RCO must ensure the equipment is properly setup and tested in accordance with prescribed procedures. When one remote control transmitter is to be utilized, only one transmitter will be linked and tested. If two remote control transmitters are to be utilized, the conductor/engine foreman must always link first as "Operator A" and the helper/switchman will link second as "Operator B". When two remote control transmitters are to be utilized in a "pitch and catch" operation, both must be tested.

### 35.3 Operating the Equipment

#### 35.3.1 Qualified Operators

Only qualified operators or students who have been trained in remote control operations may operate a Remote Control Transmitter.

#### 35.3.2 One Locomotive Consist

A RCO shall control only one locomotive consist at a time with a Remote Control Transmitter and shall not operate simultaneously any other locomotive.

#### 35.3.3 "Pitch and Catch" Operations

When using "pitch and catch" operations, the procedure for changing operators specified in the Operator's manual must be used. Before control of the remote control Locomotive can be transferred from one crew member to another, the receiving remote control operator must be notified verbally and acknowledge verbally being in position to assume control.

#### 35.3.4 Moving Motorized Vehicle

Operation of the Remote Control Transmitter must not be performed from a moving motorized vehicle.

#### 35.3.5 Dropping of Cars

Dropping of cars is prohibited during remote control operations except at locations specifically authorized by the Superintendent.

#### 35.3.6 Coupling Cars

When using a remote control locomotive in "pitch and catch" operations to make a coupling, the RCO located at the coupling must be the primary operator.

#### 35.3.7 Initiating a Movement

Before initiating a movement, the remote control operator or crew member must be in a position to visually determine the direction the equipment will move.

#### 35.3.8 Movement of Lite Remote Control Locomotive

The primary operator must take a position on the leading end of a lite remote control locomotive consist prior to moving when the movement will exceed the length of the remote control consist.

### 35.4 Securing Equipment

#### 35.4.1 Secure Remote Control Devices and Locomotives

Remote control locomotives and remote control transmitter(s) must not be left unattended unless secured and/or disabled.

When leaving equipment for meal period, break, etc. (short term securing), the RCO will secure remote control locomotive as required and turn the remote control transmitter power off or put in "sleep" mode. The remote control operator must maintain possession of the Transmitter(s).

When ending tour of duty, the remote control operator must place the locomotive in the MANUAL mode and secure the locomotive unless another remote control operator is relieving the current remote control operator. When that occurs a job briefing must be held between employees. Transmitters must be transferred from conductor/foreman to conductor/foreman (Operator A) and helper/switchman to helper/switchman (Operator B).

#### **35.4.2 Storing Remote Control Devices**

Spare remote control transmitters must be stored with power off. Battery must be removed and placed in a charger.

### **35.5 Remote Control Area**

#### **35.5.1 Designated Remote Control Areas**

Timetable Special Instructions will designate areas of remote control operations. Signs advising that remote control operations may be in effect will be posted at access locations to Remote Control Areas.

#### **35.5.2 Track Removed from Service or Working Limits**

The RCO in control of a remote control locomotive must be notified of any track removed from service or working limits established for the protection of another craft. The RCO must conduct a job/safety briefing with all members of the crew.

### **35.6 Remote Control Zone**

#### **35.6.1 Designated Remote Control Zones**

Timetable Special Instructions will designate limits of Remote Control Zones. Signs will be posted at access locations to Remote Control Zones. Only the RCO may activate a Remote Control Zone. Remote

control zone limits do not include tracks within CTC or interlocking limits (CTC or interlocking rules apply).

#### **35.6.2 Activated Remote Control Zone**

When a remote control zone is activated, the RCO must ascertain that switches/derails are properly lined and track(s) within the zone are clear of trains, engines, cars and men or equipment fouling track. The RCO is then relieved of point protection and the requirement to stop in one half the range of vision for pull out movements with locomotive on the leading end only.

An active remote control zone may be transferred to remote control operators on other remote control assignments. If a remote control zone is transferred:

- A job briefing must be conducted each time the zone is transferred between remote control operators.
- The RCO taking control of the zone must ascertain or have information that the zone is clear and switches are properly lined for their movement before relieved of point protection and the requirement to stop in one half the range of vision.
- A job briefing must be conducted between the remote control operators before the zone is deactivated if both assignments are on duty.

#### **35.6.3 Ending the Tour of Duty**

When the RCO ends the tour of duty:

- The Remote Control Zone must be deactivated.

- The Remote Control Zone may remain active if a job/safety briefing is conducted with the relieving RCO.

or

- The Remote Control Zone may remain active if the subdivision general-order specifies the hours the Remote Control Zone is active.

#### **35.6.4 Entering a Remote Control Zone**

Before entering a remote control zone, all employees that are not part of the remote control crew must determine whether the zone is activated. Employees may receive this information from the RCO in charge of the zone or other authorized employee.

When the Remote Control Zone is activated, track(s) within the zone must not be fouled with equipment, occupied, or a switch

operated until the remote control zone has been deactivated or permission is granted by the RCO to enter the remote control zone.

Trains or Engines may occupy an active remote control zone when permission is obtained from the remote control operator. Other employees with equipment that may occupy or foul the track must have the remote control zone deactivated.

The RCO must comply with Rule 6.28 while other employees are in the remote control zone or when the zone is deactivated. The remote control operator will be advised by the employee that was granted permission to enter the zone that they and their equipment are clear of the zone. The remote control operator must ensure the track is clear and switches are properly lined after other employees are clear of the remote control zone.