

Legislative Representatives:
Local # 117 – Timothy Burch
Local # 161 – Patti Otani
Local # 324 – Todd Kester
Local # 426 – Darren Volland
Local # 556 – Kirk Sides
Local # 845 – Tracey Council
Local # 855 – Steve Mazulo



Legislative Representatives:
Local # 977 – Gary Howell
Local # 1238 – Shane Sadler
Local # 1348 – Herb Krohn
Local # 1505 – Donald "Bud" Newton
Local # 1637 – Clyde Rosa
Local # 1713 – Dwayne Hawkins
Local # 1977 – Travis Anderson

Washington State Legislative Board Representing Railroad Train & Bus Service Employees of Washington State

11225 Roosevelt Way N.E., Seattle, WA. 98125

Washington State Legislative Board Executive Committee:

Herb Krohn – Washington State Legislative Director – 206-713-5442 email: hskrohn55@hotmail.com

Steve Mazulo – Assistant Legislative Director / Gary Howell – Board Chair & Alternate Legislative Director / Todd Kester – Secretary / Clyde Rosa – Vice Chairman

Mr. Steven V. King,
Executive Director and Secretary,
Washington State Utilities and Transportation Commission,
1300 S. Evergreen Park Drive S.W., P.O. Box # 47250,
Olympia, WA. 98504-7250

March 25, 2018

State of Wash.
UTIL. AND TRANSP.
COMMISSION
03/26/18 08:39
Received
Records Management

Re: Docket # TR0170780 – Rulemaking to implement ESHB 1105, Chapter 333 Laws of Washington State - Comments of labor organization representing affected railroad employee passengers.

Dear Executive Director & Secretary King:

As the organization representing approximately 2000 railroad workers in Washington State which spearheaded the legislation now undergoing the rulemaking process your agency, to remedy the serious longstanding systemic failures that resulted in serious accidents over the past three decades. Many of our members lost their careers in these accidents, many suffered critical injuries, and some were involved in fatalities.

We wish to remind the Commission that we are mandated by our railroad carrier employers to ride in railroad carrier contracted crew transportation vehicles; we have no choice or any other option except unemployment.

The rules you adopt will have a direct daily impact on our lives and safety; so we want to take this opportunity to thank you for the opportunity to participate in this rulemaking process, and we are extremely appreciative of you and your agencies willingness to listen and give due consideration to our concerns, as we seek to insure that longstanding safety risks and hazards are addressed and eliminated through the enforcement of the rules you adopt.

Regarding the current proposed rules, we remain concerned about the low allowable age for rail crew transportation drivers; our greater concerns center on driver training methodology, as we expect that contract crew transport firms will consider requiring new drivers to watch a few hours of driver safety videos as adequate training. We assert that outside professional driver training firms should be required to certify rail crew transport drivers and that prospective drivers ought to be required to successfully pass a specially developed qualifying exam focusing on the unique and inherent risks associated with driving within railroad facilities, adjacent to railroad tracks and frequently traversing railroad crossings. Additionally, we have also noted systemic safety hazards at common train crew pick up and drop off locations still needs to be addressed.

However, our greatest concern is the absence of requirements for studded tires on rail crew transport vehicles utilized to transport railroad employees across our states mountain passes in winter snow and icy conditions. There have been so many rail workers who have been injured or suffered the loss of their careers because of the

lack of adequate traction when riding in contract crew transportation vehicles in winter weather conditions. The lack of any requirement for snow tires remains as our greatest unaddressed concern in the proposed regulations.

Nonetheless, we are very satisfied with most of the other proposed rules, as we believe the new regulations will considerably increase the safety of railroad workers riding in contract crew transportation vehicles.

Therefore we strongly urge the Commission to proceed forward and adopt the current proposed rules immediately, however we urge the Commission to consider allowing a strictly limited rulemaking process to remain open for the next 12-18 months, to see how the new rules are working and to determine whether additional rules or revisions are necessary to address issues of driver training, hazardous loading/unload locations; but most importantly to consider adoption of rules requiring studded tires for contract crew transport vehicles regularly utilized to traverse dangerous winter weather conditions.

Once again, we are grateful to the Commission and the staff within your agency for giving serious consideration to our concerns during this Rulemaking process, we welcome the opportunity to continue working closely and cooperatively with your agency and other stakeholders as actual enforcement of the newly adopted regulations begins.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'Herb Krohn', with a stylized, cursive flourish extending to the right.

Herb Krohn
Washington State Legislative Director
SMART union Transportation Division/UTU