

Surface Transportation Board
395 E Street Southwest
Washington D.C. 20423

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RE: EP 770 Rail Service Hearing

04/24/2022

Dear Chairman Oberman,

I am a railroad employee and have been working as a conductor/locomotive engineer for over 25 years. I would like to point out a few of the problems with the current state of the rail industry from our point of view at ground zero.

The railroad I work for has spoken out against Precision Scheduled Railroading(PSR), but has been using it to show record profits for its shareholders at the expense of customers and employees.

- 1: Trains are running much slower(sometimes over half the authorized speed) in order for the railroads to save money on fuel(and continue to have record profits).
- 2: Crews are worn out from being left on trains twice as long for no additional pay.
- 3: Contract companies are not able to supply vans and drivers when the Railroads need them, leading to crews going over hours of service (often more than 15 hrs and, in the last year, a few over 20 hrs on duty).
- 4: No crew management.

The railroad has never been able to manage crews and somehow they think some software and strict attendance policies will fix this.

Bottom line is they would be able to run far more trains with the current number of employees if they allowed trains to run closer to track speed, had plans in place to get crews to the next terminal within their hours of service, and had short turnaround crews available to relieve crews near the next terminal when they aren't going to be able to accept the train for several hours.

Much of the blame is on the carriers, but I must also say that revisions to the RSIA must also be made in order to resolve many of the current transportation problems. The Railroad Safety Improvement Act requires that crews get 10 hours of undisturbed rest after a tour of duty. Additionally, if they go over their hours, they must have an additional minute of rest for every minute they worked over 12 hours. If a crew is working to the

away from home terminal this can lead to 16 or more hours in the hotel. I don't know who came up with this plan as all it does is guarantee that I am going back to work fatigued. I don't know a single person that can sleep an additional minute for every minute they work beyond 12 hours. Additionally, crews with six crew starts, with less than 24hrs off between, must have 48hrs rest. The railroad circumvents this by deadheading crews on the 5th or 6th start.

In my humble opinion RSIA should be modified to:

- 1: Only require 8 hours of undisturbed rest at the away from home terminal and any additional rest required for working over 12 hours should be able to be observed when returning to your home terminal.
- 2: More options for rest at our home terminal, where we can actually use it to spend time with our families. **(If you want train traffic to speed up, force the railroads to allow us as much time off at home as our trip took e.g. if we're gone 48hrs we can book 48 at home).**
- 3: Make Deadheading count as a start towards RSIA rest. (we often deadhead on trains, that take 8 to 12 hrs)
- 4: Make it Federal Law that crews not tied up in 12 hours must be paid double time. (Nothing is going to change in regards to getting crews in before their hours of service expire unless it costs the carriers something.)

My other brothers have sent letters explaining why the railroads have had trouble retaining and hiring new employees, and I agree with their statements and will not reiterate those here..

Thank you for your consideration,
Clark Thomson
Locomotive Engineer
BLET