Our Members Speak Out

Fuel Conservation Tech – like PTC – Can Lead to Dangerous Distractions

While we rails quietly repose following the heroic vote by our Brothers and Sisters of SMART GO-001 in overwhelmingly defeating the dangerous single crew proposal, the railroads continue to work diligently to undermine our efforts; gambling with the lives and safety of those who live, work, or commute on or near our nation's railroads. We remain vulnerable and threatened. The railroads only have to win once while we must prevail at every challenge. We have the tools to be successful, but we must be eternally vigilant and *proactive* rather than reactive. It is with this thought in mind that we offer the following:

We have expressed our deep concern about the loss of a safe working environment while engineers are required to utilize the "Leader" and "Trip Optimizer" fuel conservation operating systems. (Smart Consist is another technology that presents a wholly different set of dangers that will not be discussed here). We believe these systems are at least as intrusive and distracting as requiring the engineer to respond to prompts and interact with planned PTC systems which the FRA Final Rule for PTC Implementation specifically prohibits. *Unchallenged*, we believe these systems represent a direct threat to the safety of our members and our communities, rail employment and the stability of our railroad retirement system. The railroads will surely point to them as precedent setting technologies, claiming them to be no more distracting than planned PTC systems and cite that no one has taken exception with the additional work load and distraction. The railroads would then petition the FRA to relieve them from the language in their final rule that prohibits the engineer from interacting with the PTC system while safety sensitive operations are being conducted. This is possibly *the single biggest threat to rail employment and public safety facing us today.*

The FRA's Final Rule on PTC Implementation provides that, "The onboard PTC apparatus shall be so arranged that each member of the crew assigned to perform duties in the locomotive can receive the same PTC information displayed in the same manner and execute any functions necessary to that crew member's duties. The locomotive engineer shall not be required to perform functions related to the PTC system while the train is moving that have the potential to distract the locomotive engineer from performance of other safety-critical duties." While this is certainly a step in the right direction, it fails to address *all* distracting technologies and is subject to politically influenced interpretations, appeals for relief, and Congressional remediation. Therefore, we insist that without proper crew staffing, task saturation and distractions placed upon a solitary operator would present a threat to safety.

As practiced today, these fuel conservation programs are flat-out dangerous. There are no current standards or requirements (CFR's) for the utilization of these programs. Some of the fuel management screens are in the engineer's line of sight, some are immediately to the left. So with some systems, the engineer is actually facing the conductor when following the prompts required, rather than looking out the windshield to observe proper whistling of crossings, watching for track defects, trespassers, unannounced track flags, diverging route signals, and maintaining all around situational awareness of train handling. Whether the screens are viewed facing forward or at ninety degrees, the system requires attention be focused on the screens in a 'eyes in the cab' posture, one not conducive to the safe operation of the train. Those using a cell phone could face forward while operating a train, but doing so is a felony violation account of the distraction these devices cause. But these fuel conservation systems are just as distracting – if not more so - with the added peril of not being able to focus one's attention on what lies ahead. Distracted by the prompts and interaction with such fuel saver programs, the faster the train operates, the more dangerous the situation becomes.

In addition, upon tie-up, engineers are required to record and report all exceptions to the operation of these systems encountered. If system prompts are suspended, they must record when, for how long, and when re-enabled. To do this, one must keep a log of all exceptions encountered en route. So now we have the train running down the track, while the engineer is facing the conductor, watching the fuel conservation screen, temporarily oblivious to what is happening outside the cab … while writing notes to comply with carrier requirements to make a full report upon tie-up, under threat of discipline! Who can remember the particulars of each incident that must be reported without taking notes? Ironically, engineers are prohibited from copying track warrants or bulletins when operating the train. Requiring them to keep track of all these circumstances is no less hazardous.

These systems fail and/or must be suspended with regularity. When trains get an automatic train stop (ATC) restriction or are sorted and sent on diverging routes or are issued special speed restrictions by the foreman in charge of a Form B, the fuel conservations system must be suspended, which is an event that must be reported upon tie-up. Furthermore, these systems often prompt the engineer to slow a train many miles before a slow order is encountered and may require braking that is not consistent with safe train handling. When these systems issue train handling instructions that are contradictory to how the engineer feels the train should be safely handled, s/he must now decide whether to follow the prompt or suspend the system and run the train in a proper manner. This is very dangerous, especially on short fast trains. All of these exceptions have to be noted and reported upon tie-up by the one person who is supposed to keep his/her situational awareness keenly focused on the task at hand; i.e. running the train safely.

Fuel conservation is a good thing, but not at the expense of distracting the engineer from running the train. Without the same strict governmental oversight that aircraft receive, these new technologies threaten a safe rail transportation system. At the very least we must demand that the task saturation and operator distraction of these new technologies receive FRA review prior to their actual utilization. The risks are too great to allow unregulated experiments to continue unabated. Railroad workers and their unions need to protest loud and clear.

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