

BROTHERHOOD OF LOCOMOTIVE ENGINEERS AND TRAINMEN

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EDWARD A. HALL
National President

VIA ELECTRONIC AND FIRST-CLASS MAIL

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The Honorable Pete Buttigieg
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

Dear Secretary Buttigieg,

On behalf of the Brotherhood of Locomotive Engineers and Trainmen (“BLET”), a Division of the Rail Conference of the International Brotherhood of Teamsters, which is the duly designated and recognized collective bargaining representative for over 31,000 active locomotive engineers and trainmen, I would like to provide additional context and respond to claims made by the Association of American Railroads (“AAR”) concerning ongoing discussion of the Confidential Close Call Reporting System (“C3RS”). As locomotive engineers, we have a vested interest in the safety of not only the locomotive engineers who operate trains, but the safety of the nation’s entire rail network on which our members operate. The safety of our members drives our concerns regarding Mr. Ian Jeffries’s letter.

In the August 24, 2023, letter, the AAR claims that “most, if not all” close call events result from employees failing to follow safety rules. Blaming workers creates the exact kind of environment where employees do not feel able to report unsafe conditions that the C3RS is designed to fix. We are deeply disappointed that the AAR continues to perpetuate this toxic work environment. Further, we are troubled that the AAR is not aware of how frequently equipment and technology fail at no fault of the operating employees. Computer and equipment failures are some of the most common unsafe conditions that our members experience – and would like to report – and the fact that AAR seems unaware of the vulnerability of equipment is baffling.

In the ongoing work being done by the BLET and the Federal Railroad Administration (“FRA”) through the Railroad Safety Advisory Committee (“RSAC”) working group on C3RS, labor has elaborated upon the reasons that the ability to report “known events” within the C3RS program is crucial. While we understand that the railroads are largely already aware of these events, C3RS reports are designed to provide insight into the cause of safety issues, not merely notification. In short – the railroads may know that a close call happened, but they will not know *why*. We believe that the underlying cause is the most important piece of information when it comes to good faith efforts to improve safety culture, and we hope that the railroads agree. Protection from discipline

– within the reasonable parameters that we have already discussed at RSAC – is key to ensuring that workers feel comfortable reporting the full story and how close calls could be prevented in the future.

We take issue with the AAR and Class I railroads' continued reasoning that more discipline will create more safety. Simply put, workers who are stressed with fears of discipline and termination are more likely to make mistakes. The railroads seem to think that if they fire enough people, there will be no more safety issues. In fact, if this were true, the railroads would have increased their safety records drastically in the last ten years since the advent of Precision Scheduled Railroading (PSR), an operating structure that led the rail industry to lay off nearly a third of the workforce, ask remaining workers do to more with less, and severely degrade service for rail customers. However, the railroads have not improved. In some cases, safety has deteriorated dramatically. This is because the work environment is untenable for many workers due to stress, fatigue, unpredictable schedules, inadequate staffing levels, and threats of extreme punitive discipline. The problem is not the workers – it is the working environment that the railroads have created.

Lastly, we are disappointed to hear that the AAR believes that RSAC discussions are at an impasse. The BLET remains at the table, ready and willing to work with the railroads to implement C3RS. We understand that working with labor and respecting the workers who generate billions of dollars of profit for the railroads is not always a priority for CEOs who expect multi-million-dollar bonuses; however, safety culture will only improve if the railroads join us in putting forth good faith effort at implementing this program.

Respectfully,



National President

cc: Amitabha Bose, FRA Administrator
M. L. Wallace, First Vice President
D. P. Estes, National Secretary-Treasurer
V. G. Verna, Vice President and National Legislative Representative