

BROTHERHOOD OF LOCOMOTIVE ENGINEERS AND TRAINMEN

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EDWARD A. HALL
National President

VIA ELECTRONIC MAIL

October 9, 2023

Mr. Amitabha Bose
Administrator
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Excessive Train Lengths Creating Hazardous/Dangerous Conditions

Dear Administrator Bose:

Following the recent increase in derailments being contributed to forces created by massive train sizes, the Brotherhood of Locomotive Engineers and Trainmen (“BLET”) requests the Federal Railroad Administration (FRA) intervention establishing a maximum train length of 7,500 feet by issuing an Emergency Order.

Train size and length played an extensive role in the recent derailments at Anniston, Alabama¹ (NS); New Castle, Pennsylvania² (NS); Hyndman, Pennsylvania³ (CSXT); and East Palestine, Ohio⁴ (NS), to name a few.

With train length continuing to expand, the Carriers have implemented the train length growth without training locomotive engineers to handle these monstrous trains properly. Class 1 Railroads have failed to consider route infrastructure, e.g. passing sidings, crossings at grade, cross-over switches, and public interactions (such as proximity to schools and hospitals) when building and dispatching very long trains. This was never an issue with trains within the 7,500-foot length. Best practices and operating techniques have been developed over decades for train crews to rely on to operate the “normal” sized trains safely. Now, very long trains are the “new normal.” Best practices do not exist. The railroads have responded by simply adding more distributed power locomotives (“DPU”), but this does not solve any problems of very long trains. It only allows the train to grow physically longer, and not operate in a safer manner. Train crews must account for undulating territory and be able to mitigate in-train forces. When trains are excessively long, train engineers are unable to adjust their operations to accommodate for terrain, which can mask where in-train forces are occurring throughout the train.

¹ March 9, 2023 – NS Train 245A109 with Six Locomotives, 32 Loads, 76 Empties, 10,262 tons with 9,795 feet in length.

² May 10, 2023 – NS Train 14M with 144 loads, 69 empties, 19,993 tons, and 12724 feet. The train was so long the crew could not hear the detector alarm.

³ August 2, 2017 – CSXT Q38831 with 128 loads, 50 empties, 18,252 tons, 10,612 feet.

⁴ February 3, 2023 – NS Train 32ND601 with 3 Locomotives, 127 loads, 36 empties, 16,889 tons, and 10,713 feet.

Mr. Amitabha Bose

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Prior to running very long trains, there were fewer derailments due to in-train dynamics. Excessive buff and draft forces have been created due to excessive train length. This has occurred in the era of Precision Scheduled Railroading (“PSR”). Since the adoption of PSR, Class 1 Railroads have been operating fewer trains (but much longer trains) with fewer train crews all in the name of ever-increasing profits. Because of the new business model and trains sometimes as long as five (5) miles, FRA and National Transportation Safety Board (“NTSB”) have had to investigate increasing incidents like the ones referenced above.

The increased accidents caused the FRA to issue Safety Advisory 2023-02 on April 11, 2023, which states that the “FRA has noticed a rising trend in recent incidents where train build and makeup have been identified as a potential cause or contributing factor.” While placing a Safety Advisory can shine the necessary light on a safety problem, it cannot address the risks that have been added to the railroad industry due to very long trains. States are seeking legislative action to address the issue as well. This is taking more time than safety will allow.

A regulatory standard is needed, but those take a very long time. For this reason, we are requesting an Emergency Order. BLET is also providing a copy of this letter to all Class 1 Rail Carriers requesting that they take immediate voluntary action to address the absence of a regulatory standard by adding a maximum train length of 7,500 feet to all trains operated. We do not want to wait until the next rail catastrophe to act.

Thank you for your continued commitment to the workplace safety of BLET members and all railroad workers and the safety of the communities they run through.

Sincerely,



National President

cc: All Advisory Board Members
All Class 1 Rail Carriers