

Who would have thought that a broken knuckle would become an FRA reportable event? Who would have thought that a parted air hose likewise would become reportable. FRA intends to make these events reportable for all of the approximately 1900 daily train starts executed by the class 1s in an attempt to create a database of occurrences in relation to train length and train weight. FRA thinks that such reporting would cost the class 1s 8 hours per class 1 per month. Really? Even with centralized dispatch centers, the recording and aggregation of data will consumer multiple hours daily. Every air hose parting, every loss of communication between train crew members or HEOT device and EOT device, every PTC enforcement for every train must now be reported.

The reasonable thing to do consistent with FRA's safety mandate is to include train length, consist size, and weight, when an accident/incident that does not occur at a highway rail grade crossing triggers the threshold for reporting to FRA using F6180.54. Then the data is consistent with the FRA's calculation of incident frequency and will or will not display a change in the trend.