

I have been employed at one of North America's Class I railroads since the late 1990s. I feel like I need to post anonymously here, and I apologize for not being more specific with details.

I've read the other comments that have been posted. It seems that the railroads' chief argument against the FRA's request to collect long-train information is that the record-keeping is too much of a burden. Anyone reading this should be aware that the railroads are already keeping track of the very data being asked for, and they have been doing so for years.

As we all know, about seven or eight years ago a trend started in the railroad industry to make trains much longer. As the railroads lengthened the trains, they experienced more mechanical breakdowns and what we call "train separations" – things like broken drawbars, broken knuckles, air hoses coming apart, and so on. In fact, in the last three years, on the territory where I work, we have seen two separate incidents where railroad cars have actually been torn in half under the stress of being in the middle of gigantic manifest trains.

Mid-level executives at my employer were well aware that there were problems with longer trains by 2017, and they formed a few committees around the system (with both management and labor representatives) to study what could be done about it. There was a lot of data collected at the time for those committees to put to use. Even now, every time a train experiences an "undesired emergency brake application" the engineer is required to fill out a web-based form to report what happened. The information the FRA is seeking already exists in the carriers' databases. However, expect the railroads to jealously hoard it because they know the information could be damning.

In addition, I want to point out that the FRA is on the right track to request data about things like broken knuckles, and the like; but I did not see an explicit request for data about broken drawbars, which are one of the most serious problems that excessively long trains experience. A drawbar is about 8 feet long and weighs something like 1000 lbs. Every time a drawbar gets torn out of a railcar, it carries the risk that this large component will roll under the cars behind it and cause a derailment. We have seen lots of close calls on the territory where I work. The railroads keep track of when, where, and how often this happens, and the FRA should ask for it.

Finally, in case no one has thought of it, the FRA should be aware that they might need data about trains that aren't so long in order to make meaningful comparisons.