

Brotherhood of Locomotive Engineers and Trainmen

A Division of the Rail Conference — International Brotherhood of Teamsters

NATIONAL LEGISLATIVE OFFICE 25 Louisiana Avenue, NW, Room A-704 • Washington, DC 20001 Phone: (202) 624-8776 • Fax: (202) 624-3086 • tolman@ble-t.org

JOHN P. TOLMAN Vice President and National Legislative Representative

VIA ELECTRONIC MAIL

November 29, 2007

Mr. Robert Brogan Office of Planning and Evaluation Division, RRS–21 Federal Railroad Administration 1120 Vermont Ave., NW Mail Stop 25 Washington, DC 20590 Ms. Gina Christodoulou Office of Support Systems Staff, RAD–43 Federal Railroad Administration 1120 Vermont Ave., NW Mail Stop 35 Washington, DC 20590

Re: OMB Control Number 2130-0500

Dear Mr. Brogan and Ms. Christodoulou:

On October 5, 2007, the Federal Railroad Administration ("FRA") published a notice in the Federal Register, announcing that it seeks renewal of approval for a number of information collection activities currently being conducted under the above-referenced OMB control number. *See* 72 FR 57097–57099. These comments are submitted by the Brotherhood of Locomotive Engineers and Trainmen, a Division of the Rail Conference of the International Brotherhood of Teamsters ("BLET"), which is the duly designated and recognized collective bargaining representative for the craft or class of Locomotive Engineer employed on all Class I railroads. The BLET also represents operating and other employees on numerous Class II and Class III railroads. Consequently, the aforementioned information collection activities have a significant impact upon our members.

The BLET supports the full range of information collection encompassed under OMB Control Number 2130-0500. However, the BLET continues to believe that revision of certain of FRA's forms to require railroads to provide additional information already in their possession will enhance the safety data available to FRA and facilitate more precise analyses of trends in the industry. Specifically, the BLET is concerned that exclusive reliance on mileage-based data in developing accident/incident and injury/casualty rates already has compromised the quality of analysis of switching operations. Furthermore, the narrow focus on mileage-based data also may infect data analysis for other freight operations in the future, because mileage-based measures

Mr. Robert Brogan Ms. Gina Christodoulou November 29, 1007 Re: OMB Control Number 2130-0500 Page 2

fail to reflect the ongoing evolution of remote control locomotive operations throughout the American railroad industry.

FRA's prior renewal notice pertaining to these activities was published on December 14, 2005. *See* 70 FR 74103–74105. In response to that notice, the BLET filed comments on January 4, 2006, a copy of which is attached hereto for your ready reference. In those comments we explained, in detail, our rationale for revising certain FRA forms to require railroads to report the number of employee hours spent in each of the various classes of service, in addition to the mileage totals currently reported. We incorporate those comments by reference as fully set forth herein.

In response to our comments, FRA stated the following:

Mr. Holmes comments — on behalf of the BLET — touch an area that has been a cause of concern for sometime for FRA. FRA believes that very important issues have been raised in BLET's comments. FRA strives to obtain the most accurate possible data so that it has a clear and complete picture of what is happening in the rail industry on both a current and historical basis. Accurate data are essential in developing and implementing an effective comprehensive rail safety program throughout the country. In the agency's view, the issues raised by BLET need to be looked into carefully. FRA would like to examine these issues by initiating an independent study sometime this year, budget permitting. Such a study raises procurement as well as budget issues that will need to addressed. Also, there will be cooperation issues, and FRA will need to ensure full cooperation with any contractor chosen for such an important study. If funding for this study can not be found in this year's budget, then FRA will attempt to obtain such funding in next year's budget. Once the independent study is completed, FRA will be able to determine any needed changes.

71 FR 9411.

In the 21+ months since FRA acknowledged the need to study the vital safety issue our 2006 comments raised, funding for the study has not been allocated. We believe that lack of reauthorization for the federal rail safety program has been a major factor in this needed work not going forward. Nonetheless, the need for such a study — and possible revision of applicable forms thereafter — is as great today as it was nearly two years ago. Indeed, given that FRA has published at least two sets of guidelines pertaining to non-incidental remote control locomotive operations on main track,¹ the issue of data normalization has become more pressing, in our view.

¹ Specifically, on September 9, 2005, and February 23, 2007, FRA's Associate Administrator for Safety issued guidance for and proposed restrictions on such movements in letters addressed to the Presi-

Mr. Robert Brogan Ms. Gina Christodoulou November 29, 1007 Re: OMB Control Number 2130-0500 Page 3

Accordingly, we urge FRA to reiterate the shared concern identified in our previous comments, and to reaffirm its intention to study the issue when sufficient funding is available to do so. We most sincerely appreciate the opportunity to participate in this matter.

Respectfully submitted,

19 Vila

vice President and National Legislative Representative

attachment

cc: Jo E. Strang, Associate Administrator for Safety (w/att.)
Grady C. Cothen, Jr., Esquire, FRA Deputy Associate Administrator for Safety Standards and Program Development (w/att.)
Thomas A. Pontolillo, Director of Regulatory Affairs (w/att.)

dents of the Association of American Railroads and the American Short Line and Regional Railroad Association.



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25 Louisiana Avenue, NW, 7th Floor Annex • Washington, DC 20001 Phone: (202) 624-8776 • Fax: (202) 624-3086 • holmes@ble-t.org

RAYMOND A. HOLMES Vice President and National Legislative Representative

VIA ELECTRONIC MAIL

January 4, 2006

Mr. Robert Brogan Office of Safety, Planning and Evaluation Division, RRS–21 Federal Railroad Administration 1120 Vermont Avenue, NW Mail Stop 17 Washington, DC 20590 Mr. Victor Angelo Office of Support Systems, RAD-20 Federal Railroad Administration 1120 Vermont Avenue, NW Mail Stop 35 Washington, DC 20590

victor.angelo@fra.dot.gov

robert.brogan@fra.dot.gov

Re: OMB Control Number 2130-0500

Gentlemen:

These comments pertain to FRA's recent announcement of its intention to seek renewal of the currently approved information collection activities identified in the above-referenced OMB control number. See 70 Fed. Reg. 74103-05. The Brotherhood of Locomotive Engineers and Trainmen ("BLET") is the recognized collective bargaining representative for the craft or class of Locomotive Engineer on all of the nation's Class I railroads, and represents locomotive engineers and other operating employees on numerous other Class II and Class III railroads, all of whom are directly affected by the aforementioned information collection activities.

BLET supports the full range of information collection encompassed under OMB Control Number 2130-0500. However, BLET believes that revision of certain of FRA's forms to require railroads to provide additional information already in their possession will enhance the safety data available to FRA and facilitate more precise analyses of trends in the industry. Specifically, BLET is concerned that exclusive reliance on mileage-based data in developing accident/incident and injury/casualty rates already has compromised the quality of analysis of switching operations. Furthermore, for reasons set forth in greater detail below, the narrow focus on mileagebased data also may infect data analysis for other freight operations in the future, because mileage-based measures fail to reflect the ongoing evolution of remote control locomotive operations ("RCL") throughout the American railroad industry.

The two measures that are of questionable validity are "train-mile" and "yard switching trainmile," which FRA define as follows:

Train-mile. The movement of a train for a distance of one mile. Mileage is not to be increased because of the presence of multiple locomotives in the train. (See definition of "train".)

Yard Switching Train-Mile. May be computed at the rate of 6 mph for the time actually engaged in yard switching service (or any other method that will yield a more accurate count) if actual mileage is not known.

See <u>FRA Guide for Preparing Accident/Incident Reports</u> (DOT/FRA/RRS-22, rev. May 1, 2003), Ch. 2, at p. 12.

BLET notes that the utility of the "yard switching miles" ("YSM") measure has been questioned for some time. Indeed, the limited value of this measure was highlighted several years ago by Foster-Miller, Inc., in its "Examination of Railroad Yard Worker Safety," covering the period from March, 1998, through September, 2000. In the section of its July 2001 Final Report entitled "Recommendations for Improved Analysis of Worker Safety," Foster-Miller stated that

More in-depth analysis of yard injury and accident data requires additional injury and accident exposure measures. Number of cars switched per month is a candidate exposure measure for both injuries and accidents. This metric, in contrast to the currently reported "yard switching miles," would be a measure of actual operations rather than an estimated measure, which may be the case for number of switching miles.

See DOT/FRA/ORD/01-20 at p. 139. FRA, itself, acknowledged the shortcomings inherent in reliance on YSM, alone, at about the same time.

On May 15, 2000, FRA published a notice that a technical conference would be held on July 19, 2000, "to examine the use of remote control locomotive technology in the railroad industry." 65 Fed. Reg. 31056. In addition to FRA representatives, the conference was attended by approximately sixty representatives from railroads and industry associations, labor organizations, technology suppliers and consultants, and government. The docket for the technical conference was comprised of thirty-six documents, totaling 839 pages. See DOT DMS Docket No. FRA-2000-7325.

On February 14, 2001, approximately eight months after the technical conference, FRA published Notice of Safety Advisory 2001-01, which established "recommended minimal guidelines for the operation of remote control locomotives." 66 Fed. Reg. 10340. In reviewing the material and comments presented at the technical conference, FRA noted that

Several commentors (sic) submitted data that indicate accidents and incidents dropped dramatically as RCL operations increased. Although FRA commends these commentors (sic) for their efforts in gathering such data, FRA notes that the data used were obtained without equal exposure metrics to allow valid comparisons between remote control and manual operations (i.e., comparisons were not equalized for the number of labor hours and number of employees). Normalizing safety data is necessary to clarify our understanding of the potential safety risks.

66 FR 10341.

Accordingly, FRA's Guideline C.4 recommended "that the railroad keep a record of the total number of labor hours and the total number of employees by location for both RCL and manual switching operations to ensure that accidents and incidents are accurately measured, and that valid comparisons between the two types of operations can then be made." 66 FR 10344. FRA revised its Rail Equipment Accident/Incident Report (Form F 6180.54) and its Highway-Rail Grade Crossing Accident/Incident Report (Form F 6180.57) by adding entries — Items 30a and 17, respectively — designed to capture whether RCL was in use at the time of the accident/incident. However, on the FRA form that captures operational data and accident/incident counts for the reporting month, Form F 6180.55, only mileage data — and not labor hour data — is required to be broken down by subcategory.¹

Because FRA has not required railroads to separately report labor hours in RCL switching operations and conventional switching operations, its analysis of switching accidents/incidents has been limited to rates that are developed using the YSM measure, which — in FRA's own words — does not provide "equal exposure metrics to allow valid comparisons between" RCL and conventional operations, because "comparisons were not equalized for the number of labor hours and number of employees." The normalization of safety data FRA identified as necessary for proper analysis produces vastly different relative accident/incident rates between RCL and convention switching operations.

For example, included in FRA's May 2004 Interim Report on the Safety of Remote Control Locomotive Operations — produced at the request of the Senate Committee on Commerce, Science, and Transportation — was a table, identified as Enclosure No. 1, bearing the title "Comparison – Reportable Rail Equipment Accidents/Incidents on Yard/Industry Tracks Involving RCL Operations and Conventional Operations (May 1 through November 30, 2003)."² The

¹ Items 11 through 14 are provided for the enumeration of freight, passenger, yard switching, and other train miles, respectively. Item 15 is provided for the reporting of all "railroad worker hours," while Items 16 and 17 cover passenger miles operated and number of passengers transported, respectively.

² For your ready reference, we have enclosed herewith a copy of said table.

rates produced by using YSM as the measure appear to indicate that RCL accidents/incidents occur less frequently than conventional accidents/incidents.

However, when the data are normalized to account for different crew sizes between the typical RCL crew and the typical conventional switching crew, the apparent RCL "advantage" disappears, and becomes a "disadvantage." Attached as Table 1 is FRA's original data, and our normalization for crew member hours ("CMH"), which establishes the analytical standard FRA identified in Safety Advisory 2001-01. The dramatic difference can best be seen by examining the RCL to conventional accident/incident rate ratios using the CMH standard, rather than YSM:

katio of RCL to Conventional	Accident/Inc	ident Rate
Category	YSM	CMH
All Railroads	0.86:1	1.30:1
All Class I Railroads	0.86:1	1.29:1
All Class II Railroads	1.08:1	1.62:1
BNSF Railway Co.	0.70:1	1.05:1
CSX Transportation	0.47:1	0.70:1
Norfolk Southern Corp.	0.90:1	1.36:1
Union Pacific RR Co.	0.88:1	1.32:1

Ratio of RCL to Conventional Accident/Incident Rates

These differences are significant, and validate FRA's original reluctance to accept data based solely upon mileage-related measures. Furthermore, FRA's Railroad Safety Advisory Committee constituted a Working Group last year to study railroad operating rules, in large part because human factor accident/incident rates on yard tracks have increased significantly since 2001, which also is the period during which RCL operations became widespread. Whether that Working Group succeeds in reversing this trend will depend — in large part — on whether it has the data required to identify the correct root causes and contributing factors to these accidents, given that inherent risks and hazards differ to some degree between RCL operations and conventional switching.³

The negative impact on safety caused by insufficient data concerning yard switching operations will spread to road operations in the coming months and years. On September 9, 2005, Associate Administrator for Safety Daniel C. Smith provided supplemental recommended RCL guide-

³ The Working Group was provided with RCL and conventional switching data covering the 13month period from December 1, 2003, through December 31, 2004, which was scheduled for publication last May in FRA's Final Report to the Senate Commerce Committee. For reasons unknown to us, publication has been delayed; therefore, none of the data will be disclosed in this letter. However, an analysis of that data by BLET members of the Working Group — similar to the YSM to CMH conversion just shown — indicates an increase in RCL accident/incident rates and a decrease in conventional accident/incident rates, as compared to the previous six-month period.

lines with respect to non-incidental main track movements, which included significant increases in the required amount of "on-the-job training" for main track movements. In simple terms, FRA has cleared the path for an expansion of main track RCL operations — whether as a bridge to serving industries located outside yard limits or for straight, point-to-point movements similar to what has transpired in switching operations over the past several years.

In light of this latest development, it now is long overdue that FRA broaden its information collection to require railroads to report the number of employee hours spent in each of the various classes of service (i.e., road, yard, passenger, other), just as they currently report miles in each of those classes. Contemporary industry computer systems, which typically track both pay and hours of service, already capture this data, and the information should be easily retrievable.

Requiring the breaking down of employee hours by class of service is truly the "measure of actual operations" that Foster-Miller identified as necessary in order to provide in-depth safety analysis. Moreover, such a breakdown would provide precisely the quality of data FRA identified in its RCL Safety Advisory as "necessary to clarify our understanding of the potential safety risks" of that technology. Accordingly, BLET respectfully requests that FRA make all revisions appropriate and necessary to require railroads to provide specific breakdowns for employee hours spend in road, yard, passenger, and other service.

Thanking in advance for your most serious consideration, I am

Sincerely,

Klymond Holmes

Vice President and National Legislative Representative

enclosures

cc: Jo Strang, Acting Associate Administrator for Safety (via e-mail Jo.Strang@fra.dot.gov)
Grady C. Cothen, Jr., Deputy Associate Administrator for Safety Standards and Program Development (via e-mail Grady.Cothen@fra.dot.gov)
Don M. Hahs, National President
BLET Advisory Board
All BLET State Legislative Chairmen
All BLET General Chairmen

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Enclosure No. 1

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<u>Comparison - Reportable Rail Equipment Accidents/Incidents on Yard/Industry Tracks</u> <u>Involving RCL Operations and Conventional Operations (May 1 through November 30, 2003)</u>

<u>Reporting Threshold</u>: For calendar year 2003, a rail equipment accident/incident must be reported to the Federal Railroad Administration if the combined amount of equipment and track damage exceeds \$6,700.

						Ratio of Accidents per			
				Yard Switching Miles			1 Million	hing Miles	
Distribution of Accidents by Railroads:	RCL	Conv Total	% RCL	RCL	Conv	<u>Total</u>	<u>RCL</u>	Conv	Total
Union Pacific Railroad (UP)	97	192 = 289	33.6	3,251,051	5,651,059 =	8,902,110	29.84	33.98	32.46
Burlington Northern Santa-Fe (BNSF)	39	149 = 188	20.7	2,080,873	5,585,742 =	7,666,615	18.74	26.68	24.52
CSX Transportation Inc. (CSX)	27	147 = 174	15.5	2,070,967	5,272,965 =	7,343,932	13.04	27.88	23.69
Norfolk Southern Railroad (NS)	5	91 = 96	5.2	431,750	7,104,466 =	7,536,216	11.58	12.81	12.74
Alton and Southern Railway (ALS)	4	3 = 7	57.1	217,564	333,903 =	551,467	18.39	8.98	12.56
Belt Railway Company of Chicago (BRC)	3	7 = 10	30.0	77,537	171,688 =	249,225	38.69	40.77	40.12
Kansas City Southern (KCS)	3	29 = 32	9.4	212,022	526,238 =	738,260	14.14	55.11	43.35
Conrail Shared Assets (CRSH)	1	20 = 21	0.0	24, 528	1,046,154 =	1,070,682	40.77	1 9.12	19.61
Montana Rail Link (MRL)	1	2 = 3	33.3	155,293	113,250 =	268,543	6.44	17.66	11.17
San Luis & Rio Grande Railroad (SLRG)	1	0 = 1	100.0	697	3,500 =	4,197	1,434.72	0.00	238.27
Birmingham Southern (BS)*	0	1 = 1	0.0	0	9,835 =	9,835	0.00	101.68	101.68
California Northern (CFNR)	0	1 = 1	0.0	3,623	2,963 =	6,586	0.00	337.50	151.84
Cleveland Works Railway (CWRO)*	0	7 = 7	0.0	0	4,622 =	4,622	0.00	1,514.50	1,514.50
Consolidated Grain & Barge (CGBX)	0	0 = 0	0.0	9,002	0 =	9,002	0.00	0.00	0.00
Florida East Coast (FEC)	0	3 = 3	0.0	5,900	241,718 =	247,618	0.00	12.41	12.11
Illinois Central (IC)	0	24 = 24	0.0	4,770	1,478,104 =	1,482,874	0.00	16.24	16.18
Indiana Railroad (INRD)	0	2 = 2	0.0	5,945	17,825 =	23,770	0.00	112.20	84.14
Jefferson Warrior Railroad (JEFW)	0	0 = 0	0.0	4,942	266 =	5,208	0.00	0.00	0.00
McKeesport Connecting Railroad (MKC)*	* 0	0 = 0	0.0	0	5,416 =	5,416	0.00	0.00	0.00
Pennsylvania Southwestern RR (PSWR)	0	0 = 0	0.0	36,216	3,354 =	39,570	0.00	0.00	0.00
Puget Sound & Pacific (PSAP)	0	1 = 1	0.0	1,462	1,648 =	3,110	0.00	606.80	321.54
Wheeling & Lake Erie (WE)	0	6 = 6	0.0	1,212	109,235 =	110,447	0.00	54.93	54.32
Wisconsin Central (WC)	0	<u>2</u> = <u>2</u>	0.0	25,632	<u>611,632</u> =	637,264	0.00	3.26	3.14
Total =	181	687 = 868	20.9	8,620,986	28,295,583 =	36,916,569	21.00	24.28	23.51

* Designates railroads that operate remote control locomotives, but only in that portion of their operations designated as a "plant railroad."

Table 1. RCL and Conventional Switching Related Train Accidents on Yard and Industry Tracks (05/2003-11/2003)																		
	Accidents			Yard Switching Miles			Accident Rate			Crew Member Hours				Accident Rate				
	RCL	Conv.		% RCL				% RCL		Conv.					% RCL		Conv.	
Railroads	Op.	Op.	Total	Op.	RCL Op.	Conv. Op.	Total	Op.	RCL Op.	Op.	All Ops.	RCL Op.	Conv. Op.	Total	Op.	RCL Op.	Op.	All Ops.
All Railroads	181	687	868	20.9	8,620,986	28,295,583	36,916,569	23.4	21.00	24.28	23.51	2,873,662	14,147,792	17,021,454	16.9	62.99	48.56	50.99
All Class I Railroads	171	632	803	21.3	8,051,433	25,618,574	33,670,007	23.9	21.24	24.67	23.85	2,683,811	12,809,287	15,493,098	17.3	63.72	49.34	51.83
All Class II Railroads	9	43	52	17.3	507,666	2,627,580	3,135,246	16.2	17.73	16.36	16.59	169,222	1,313,790	1,483,012	11.4	53.18	32.73	35.06
All Class III Railroads	1	12	13	7.7	61,887	49,429	111,316	55.6	16.16	242.77	116.78	20,629	24,715	45,344	45.5	48.48	485.54	286.70
Alton & Southern Rwy [ALS]	4	3	7	57.1	217,564	333,903	551,467	39.5	18.39	8.98	12.69	72,521	166,952	239,473	30.3	55.16	17.97	29.23
Belt Rwy Co. of Chicago [BRC]	3	7	10	30.0	77,537	171,688	249,225	31.1	38.69	40.77	40.12	25,846	85,844	111,690	23.1	116.07	81.54	89.53
Birmingham Southern [BS] *	0	1	1	0.0	0	9,835	9,835	0.0	0.00	101.68	101.68	0	4,918	4,918	0.0	0.00	203.36	203.36
BNSF Rwy Co. [BNSF]	39	149	188	20.7	2,080,873	5,585,742	7,666,615	27.1	18.74	26.68	24.52	693,624	2,792,871	3,486,495	19.9	56.23	53.35	53.92
California Northern RR Co. [CFNR]	0	1	1	0.0	3,623	2,963	6,586	55.0	0.00	337.50	151.84	1,208	1,482	2,689	44.9	0.00	674.99	371.86
Cleveland Works Railway (CWRO) *	0	7	7	0.0	0	4,622	4,622	0.0	0.00	1514.50	1514.50	0	2,311	2,311	0.0	0.00	3028.99	3028.99
Consolidated Grain & Barge Co. [CGBX]	0	0	0	0.0	9,002	0	9,002	100.0	0.00	0.00	0.00	3,001	0	3,001	100.0	0.00	0.00	0.00
Consolidated Rail Corp. [CRSH]	1	20	21	4.8	24,528	1,046,154	1,070,682	2.3	40.77	19.12	19.61	8,176	523,077	531,253	1.5	122.31	38.24	39.53
CSX Transportation [CSX]	27	147	174	15.5	2,070,967	5,272,965	7,343,932	28.2	13.04	27.88	23.69	690,322	2,636,483	3,326,805	20.8	39.11	55.76	52.30
Florida East Coast Rwy Co. [FEC]	0	3	3	0.0	5,900	241,718	247,618	2.4	0.00	12.41	12.12	1,967	120,859	122,826	1.6	0.00	24.82	24.42
Illinois Central RR Co. [IC]	0	24	24	0.0	4,770	1,478,104	1,482,874	0.3	0.00	16.24	16.18	1,590	739,052	740,642	0.2	0.00	32.47	32.40
Indiana Rail Road Co. [INRD]	0	2	2	0.0	5,945	17,825	23,770	25.0	0.00	112.20	84.14	1,982	8,913	10,894	18.2	0.00	224.40	183.58
Jefferson Warrior RR [JEFW]	0	0	0	0.0	4,942	266	5,208	94.9	0.00	0.00	0.00	1,647	133	1,780	92.5	0.00	0.00	0.00
Kansas City Southern Rwy Co. [KCS]	3	29	32	9.4	212,022	526,238	738,260	28.7	14.15	55.11	43.35	70,674	263,119	333,793	21.2	42.45	110.22	95.87
McKeesport Connecting RR Co. [MKC] *	0	0	0	0.0	0	5416	5,416	0.0	0.00	0.00	0.00	0	2,708	2,708	0.0	0.00	0.00	0.00
Montana Rail Link [MRL]	1	2	3	33.3	155,293	113,250	268,543	57.8	6.44	17.66	11.17	51,764	56,625	108,389	47.8	19.32	35.32	27.68
Norfolk Southern Corp. [NS]	5	91	96	5.2	431,750	7,104,466	7,536,216	5.7	11.58	12.81	12.74	143,917	3,552,233	3,696,150	3.9	34.74	25.62	25.97
Pennsylvania Southwestern RR, Inc. [PSWR]	0	0	0	0.0	36,216	3,354	39,570	91.5	0.00	0.00	0.00	12,072	1,677	13,749	87.8	0.00	0.00	0.00
Puget Sound & Pacific RR Co. [PSAP]	0	1	1	0.0	1462	1,648	3,110	47.0	0.00	606.80	321.54	487	824	1,311	37.2	0.00	1213.59	762.58
San Luis & Rio Grande RR [SLRG]	1	0	1	100.0	697	3,500	4,197	16.6	1434.72	0.00	238.27	232	1,750	1,982	11.7	4304.16	0.00	504.46
Union Pacific RR Co. [UP]	97	192	289	33.6	3,251,051	5,651,059	8,902,110	36.5	29.84	33.98	32.46	1,083,684	2,825,530	3,909,213	27.7	89.51	67.95	73.93
Wheeling & Lake Erie Rwy Co. [WE]	0	6	6	0.0	1,212	109,235	110,447	1.1	0.00	54.93	54.32	404	54,618	55,022	0.7	0.00	109.85	109.05
Wisconsin Central Ltd. [WC]	0	2	2	0.0	25,632	611,632	637,264	4.0	0.00	3.27	3.14	8,544	305,816	314,360	2.7	0.00	6.54	6.36
Rates are accidents per million yard switching miles or per million crew member hours for the two types of operations																		
* RCL operations limited to "plant railroad" portion.																		