



Train Crew Staffing: The Short Line Railroad Perspective

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Introduction

- Approximately 600 Class II and Class III railroads in the United States
- Short line railroads operate 47,500 miles of freight rail in the United States (29% of the freight rail infrastructure)
- Most short lines meet the definitions of a small business
- On average, short line railroads employ fewer than 30 people, run an average of only 79 miles, and have \$7.7 million or less in revenue

Short Lines Face significant challenges

- Capital Intensive Operations
- Access to Capital
- Carload Traffic
- Class I Connections

Current Operations

- Some short line railroads currently operate with one person in the locomotive cab
 - One person crew
 - One person in the locomotive, another person in a utility vehicle
 - One conductor assigned to multiple trains
- No safety data to show that these operations are less safe than multi-person crew operations

Small Railroad Exemption

FRA prior exemption for small railroads if the maximum authorized speed of the train is limited to 25 miles per hour or less; and the average grade of any segment of the track operated over is less than 1 percent over 3 continuous miles or 2 percent over 2 continuous miles

- A disincentive for railroads to upgrade their track because it would necessitate additional staffing costs.

Special Approval Procedure

- Tremendous burden on small businesses, as most short line railroads do not have the internal resources to apply for special approval.
- Lack of regulatory certainty presents challenges for railroads to continue to invest in their businesses.
- Short lines are subject to economic volatility

Regulatory Flexibility Analysis Required

- The RFA, as modified by SBREFA, requires an agency to complete a regulatory flexibility analysis of a rule unless it will not have a significant economic impact on a substantial number of small businesses
- A rule requiring staffing changes will have a significant economic impact on short line railroads, the overwhelming majority of whom are small entities