



THE INDIANA RAIL ROAD COMPANY

1500 SOUTH SENATE AVENUE, INDIANAPOLIS, INDIANA 46225 PH. 317-262-5140 INRD.COM

Background on Indiana Rail Road Company's One-Person Crew Operations

The Indiana Rail Road Company ("INRD") is a 250-mile regional railroad operating in Indiana and Illinois, and it has been safely and effectively operating with one-person crews since 1997. In 1986, INRD purchased a rail line from the Illinois Central. Prior to purchase by INRD, Illinois Central was operating two trains a day with 10 people (5 people per train) on a dilapidated 110-mile segment of railroad. After purchasing the Illinois Central rail line, INRD took unnecessary employees off of the trains, implemented innovative operating practices, such as one-person crews, and shed rigid work rules. Subsequently, INRD could then offer rates competitive with the trucking industry and capture substantial amounts of traffic that previously moved by lower cost trucking operations. As a result, INRD has grown from 14,000 carloads in its first full year of operation to 136,203 carloads in 2021 and has grown the company from 16 employees to 130 employees in the same time frame.

The implementation of one-person crew operations at INRD required research, innovation and use of new technology. The railroad worked closely with the Federal Railroad Administration ("FRA") Chicago Region Office to develop safe one-person crew practices and rules. There is a section in the INRD Special System Instructions, developed with assistance from FRA, applicable to one- person crew operations, which is periodically reviewed by the FRA. In addition to consulting with the FRA, INRD studied the operations of New Zealand's Tranz Rail. Tranz Rail implemented one person crews in 1987. INRD observed Tranz Rail's operating practices, reviewed their Alternative Train Crewing Handbook, interviewed employees and discussed issues of alertness and fatigue with Tranz Rail officials. INRD also obtained information from a study performed by New Zealand Tranz Rail that concluded that

the health and safety of individuals and the public were not compromised by employing one-person crew operations. Prior to implementing one-person crew operations, INRD also reviewed the Study of One-Person Train Operations, dated May 1997, prepared by Beauchemin Beaton Lapointe Inc. for the Transportation Development Center (TDC) in Canada, which studied one-person operations in Belgium, Sweden, United Kingdom, Germany, Netherlands, New Zealand, Sweden and Norway. Finally, INRD considered suggestions and safety concerns of its own employees and management during implementation of the new one-person crew operations.

Scope of One-Person Crew Operations

In 2021 INRD utilized one-person crew operations on about thirty-one (31) starts per week. The track speed on half of INRD's 250 track-miles is forty (40) miles per hour. The average speed of a train on INRD is thirty-five (35) miles per hour. The average distance a train is operated during a one-person crew shift is seventy (70) miles and the average on-duty time of a one-person crew is 9.40 hours. One-person crew operations run seven (7) days a week. The average train size is approximately sixty-five (65) railcars, typically merchandise or coal trains. Merchandise trains may contain some hazmat cars, but do not contain any crude oil or PIH.

Currently, all train operators undergo a rigorous year-long training program that involves classroom and field work and are certified, per FRA regulations, as both conductors and engineers and are thereafter referred to at INRD as "train operators." They are trained and tested on the INRD Special System Instructions, including rules for "One Person Road Operations," developed in conjunction with the FRA. INRD train operators on a one-person



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crew are not distracted by managing consist and train make up because they handle trains that have already been made up. The train operator receives the train consist of a complete train from customer service. In the event any pick-ups or set-outs of railcars are required, the one-person crew must wait for another employee to perform those actions, according to INRD rules.

Any FRA rules that apply to an engineer or conductor also apply to an INRD one-person crew and all one-person crews are required to hold a job briefing with dispatch prior to beginning the job. There are additional rules that apply only to one-person operations. For instance, per INRD One Person Road Operations rules, a train operator may not operate a locomotive long hood forward in excess of two miles and must contact dispatch to send another employee to assist in the event a crossing must be flagged. Additionally, a train operator who is performing one-person operations must stop the train before copying a mandatory directive from dispatch. INRD rules require that before a train dispatcher may issue a mandatory directive to a one-person crew, the dispatcher must ask the crew, "Are you stopped?"

INRD has implemented additional safety measures as well. Each INRD locomotive has an in-cab alerter that continuously monitors train operator vigilance, senses train operator's control inputs such as throttle, brakes and horn and prompts the train operator for response if no activity is detected after thirty seconds. If no response is received from the train operator the in-cab alerter initiates a safe emergency stop. INRD also uses a fleet management system which permits managers and dispatchers to monitor the condition, speed and location of each train. INRD continues to test new technology, such as a recent

trial of in-cab automated warning system that gives verbal warnings to train operators if they are getting close to the speed limit or improperly utilizing the braking system.

When operating as a one-person crew, train operators are required to have an operable company-issued cell phone in conjunction with radio communication. The train operator must test both the cell phone and the radio prior to departure. Cell phones remain off and are stored out of sight in a train operator's grip during operation of the train and are only to be turned on in case of an emergency. INRD's train operators are in continuous radio contact with dispatch. In the event of a train problem, the train operator is instructed to contact dispatch to call another employee in for assistance. At any given time, a train is not more than about an hour away from another employee on the railroad. In the unlikely event a train operator must leave the cab of the locomotive, the train operator must secure the train, lock the cab and check in at regular intervals with dispatch.

INRD has never had an incident involving a one-person crew that was caused by crew fatigue. Prior to implementing one-person crews, INRD considered ways in which to regulate train operator schedules. All INRD employees work local jobs and have the ability to return to their home after every shift. Where operationally possible, one-person crews are given assigned jobs with set schedules where they work the same time each day. Two-thirds of INRD's train operators are on assigned jobs. Train operators on INRD's extra board work 6 days on with 2 days off, in a row. The average on-duty time for a one-person crew in 2015 was 9.19 hours. INRD also provides safeguards such as the in-cab alerter which will stop the train in the event a train operator falls asleep. INRD rules mandate that a one-person crew must test or confirm that the alerter is operational before departure.



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Further, as INRD has updated the quality of its track, and therefore the speed, train operators are able to complete a job in less time, resulting in shorter shifts and less time on-duty. INRD employs one-person crews only where it makes operational sense and creates efficiencies without compromising safety or violating FRA operating rules. For instance, jobs that require protection for shoving or pushing movements or require manual activation of switches are staffed with a two-person crew. INRD performs regular drug and alcohol testing and strictly enforces the prohibition on using electronic devices in the locomotive cab. Random stops of crews are regularly performed by managers.

Safety Experience/Results

Safety is the number one priority at INRD. If there were any indication that operating with one-person crews endangered the safety of INRD employees or the public, INRD would not continue one-person operations regardless of the efficiencies. But, there is no evidence that one-person operations are unsafe. In fact, INRD has operated safely with one-person crews for over two decades.

INRD's own internal data clearly indicates one-person crews are, in fact, just as safe two-person crews. INRD has had only one FRA-reportable human factor incident involving a one-person crew in 24 years of operations. Of the non-FRA reportable human factor incidents, one-person crew operations were 18.6% of INRD man hours in 2006-2021, but accounted for only 6.2% of human factor incidents. Two-person crews were 81.4% of INRD man hours in that same time frame, but accounted for 93.8% of human factor incidents. Additionally, the BLET has recognized the safe one-person crew operations of INRD and has agreed to one-person crews since 2001.

Conclusion

INRD has safely operated with one-person crews since 1997. During the past 25 years, INRD has seen improvements in its productivity, allowing it to provide competitive, environmentally-friendly service to its customers.