

# Risk Assessments Can Be Helpful

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- We encourage the use of risk assessments to manage risk and improve safety
  - Understand what can go wrong, determine why, understand how likely such events may be, and consider the range of potential consequences
- Should be objective, sound, documented, consistent, and comparable
  - Critical when used by different organizations on different operating systems for evaluation against a common set of thresholds/criteria
  - Evaluations should also be objective, sound, and consistent
- Risk assessments should inform decisions, not drive them
  - Help prioritize the risks for risk management decisions and investments
  - Minimizing one risk without considering others may lead to little or no overall risk reduction

# Issues With Proposed Crew-Size Risk Assessment Approach

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- Focuses on a single part of the operation in a way that is inconsistent, as other sources of risk do not have risk assessment requirements
  - Mandates attention to one source or risk regardless of other risks
  - Prioritization across a set of hazards helps ensure the most impactful risks get the most attention
- Our technical concerns span scope/scale, acceptability matrix and scales, risk measurement, and proper/complete understanding of PTC implementation
  - FRA's baseline risk assessment for crew size did not include the full range of mitigation approaches under PTC or the associated operational changes
  - In addition, PTC systems benefit many types of accidents, enhancing safety regardless of crew size for certain (more-likely) types of accidents
    - Risk assessments should consider both potential improvements and detriments in safety performance to be complete

# Risk Assessments Should Help Inform Decisions

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- Risk assessments with thresholds as a hard line in the sand have not really been accepted in U.S. regulations or in business settings
  - Important to avoid doing for only a portion of an operation
  - Need to consider comprehensive set of potential benefits
  - Don't want to limit consideration of new technological solutions
- Reiterating, risk assessments should inform decisions, not drive them, and should help to prioritize the risks for risk management decisions/investments
  - *Driving the risks associated with crew size down to the “acceptable” thresholds given in the proposed rule may not reduce the overall risk significantly—even if such reduction were possible*