Before the
National Transportation Safety Board

Docket No. DCA-12-MR005

Testimony of

Dennis R. Pierce, National President
Brotherhood of Locomotive Engineers and Trainmen

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Madame Chairman — Members of the Board — good morning. I want to thank you for the opportunity to provide the views of the Brotherhood of Locomotive Engineers and Trainmen concerning issues having life and death consequences for the BLET's 37,500 active members.

I'll start with our perspective regarding safety risks and implications and obstacles to improvement — task overload in the operating environment — performance expectations by the railroad — the effectiveness of post-incident remedial actions — and I'll close by contrasting legitimate safety culture with the reality in the field today.

The job of a locomotive engineer has become astonishingly more complicated since I was promoted 32 years ago — so much so that I can only touch upon a couple of critical concerns in the time allotted to me.

It is obvious to most of us that there are limitations on how many tasks any human being can safely accomplish at one time. Whether it be new technology, new regulations, or new operating requirements, engineers must multi-task more now than ever before, much of it under intense scrutiny via the railroads' technology that automatically downloads the locomotives' activities.

Although we are hopeful that current study at the Volpe Center on this very issue lead to the development of industry standards that will help in determining when task overload has created an unsafe condition, the industry as a whole has shown little interest in addressing this issue. For example, distributive locomotive power placed throughout the train and controlled by the engineer from the lead locomotive has become commonplace in the industry, especially on the Western roads. The challenge of keeping a train intact with different portions on different — and often opposite — grades is magnified today when a mid-train or rear end D-P consist must be operated separately from the head end consist.

Similarly, current regulations governing the use of train whistles require that much more attention be given to the timing and duration of whistling crossings, all under threat of disciplinary action for less than perfect compliance. Add that on many territories, engineers are inundated with written notices, bulletins and train orders that require them to carry and be familiar with reams of paperwork as they traverse the line on which they operate. While no single item on this list of duties would be of concern in most operating situations, the industry cannot deny that task overload exists and expect to avoid the disastrous consequences that follow when any engineer is expected to do more than is humanly possible.

Also from an operating perspective, today's engineers have far fewer approved train handling options than their predecessors. Power braking is largely prohibited; dynamic braking is mandated to conserve fuel and reduce wear and tear on brake shoes. More and more locomotives are being equipped with on-board fuel management electronics, which not only further reduce an

engineer's operational choices, but the technology often reduces available power when engineer expect it least, further complicating his duties.

When I trained to become an engineer, I was taught that if your train isn't braking as expected, your job is to get stopped before passing the next signal — by any means necessary. Today's engineers are so intimidated by the threat of discipline up to and including dismissal for initiating heavy brake pipe reductions to get maximum braking affects, or for placing their train in emergency that often do neither when they truly should.

It's ironic that — at a time of legitimate transportation industry concern over distractions from personal electronic devices such as cell phones — my members are buried in a growing blizzard of electronic devices installed to increase productivity and monitor performance in ways that divert their vigilance from the roadway ahead — which no one seems to worry about.

With so many systems to manage, today's locomotive engineers are routinely put in situations where they are severely challenged to balance all that he or she has to do. Yet, the standard response when things go wrong is to continue to blame the worker by punishing the person, instead of fully investigating the root causes of events in this complex operating environment, then adjusting systems and procedures to reduce risk.

The fact is **no one** comes to work planning on running by a red signal. And **no one** learns to become a better engineer by spending up to two years unemployed for passing one. Nor does the industry reduce red signal infractions by firing engineers who pass a red signal to send a message to those that have never passed one. Such messages are useless; no one passes a red signal on purpose.

In the aviation industry, pilots are trained in simulators to safely handle unexpected operating problems. Although UP has experimented with non-punitive programs — such as Clear Signal for Action and the Confidential Close Call Reporting System — neither program is designed to assess and then train to reduce signal violations. No train powers or brakes the same, and there are locations on every run where the average engineer hopes to never have to stop. I can still name those locations on my old run.

The industry must work with labor to identify problem locations or circumstances, as only through cooperation and training, will we create safer workplace. Anything short of that will fail to address red signal infractions in a way that avoids incidents that result in injury or fatality that the NTSB must investigate.

Every time a train being operated by a BLET member passes a red signal, it is matter of timing and inches that determine whether it will collide with another train being operated by a BLET member — that is life and death. We are a proud craft, and we do not take these risks lightly.

But we do not agree that any engineer should be blamed for the systemic risks created by adding layer upon layer of electronic technology without proper training and retraining, and with inadequate consideration of the complexities of the human-machine interface. The industry can do better than that. We are capable and ready to participate in that effort.

I thank you for your time and attention, and I'll try to answer any questions you may have.