

OPPOSE TRAIN CREW SIZE LEGISLATION

THE SHORT LINE INDUSTRY

The American Short Line and Regional Railroad Association (ASLRRA) represents 603 short line and regional railroads that provide first and last mile service to more than 10,000 shippers, particularly in small towns and the rural heartland. Short lines operate 47,500 miles of track in 49 states, or approximately 29% of the national railroad network, touching in origination or termination one out of every five cars, or 21 million cars annually, serving customers who otherwise would be cut off from the national railroad network and the U.S. economy.

Operating in a highly regulated, capital-intensive environment, these small businesses require flexible operating practices to safely and efficiently serve the unique needs of their customers and communities.

ISSUE: LABOR-PROPOSED CREW SIZE LEGISLATION LEADS TO ADDED COST WITH NO SAFETY BENEFIT.

Legislatively mandating the number of employees on freight rail trains is bad public policy. Additional labor costs could force these small railroads to face choices that will create undesirable public outcomes.

- Creates pressure to increase freight rates, potentially driving shipments onto the public roadways, **exacerbating an already underfunded highway system and financially harming the short line railroads.**
- Increases unnecessary labor costs that could result in reduced infrastructure investment, leading to **deteriorating track structures, locomotives and freight cars and impaired ability to serve local customers and communities.**

LEGISLATED CREW SIZE WILL HARM SHORT LINE FREIGHT RAILROADS AND THEIR CUSTOMERS

Efficient Operations

Many small railroads currently operate with two-person crews, not because it is mandated, but rather because it has been determined to be the best means to meet the requirements of customers.

In other cases, both crew members may not be on board the train. The engineer is aboard the train and the conductor is on the ground, supporting the operation and providing direction to the engineer. In some yard switching operations, a locomotive may be controlled by an engineer on the ground.

Removing the ability of railroad management to manage on board crew sizes based on customer needs will **result in less efficient operations, negatively impacting the customers and communities relying on that rail service.**

Safety

Accident data, available through the Federal Railroad Administration, shows no evidence that two-person crews are safer than single-person crews. Because of the possibility of distractions and of miscommunications, **requiring multiple persons in the cab has the potential to complicate work and could increase safety risks.**

Interstate Commerce

Many short line and regional railroads transport freight moving in both interstate and intrastate commerce. If each state took its own legislative approach to define minimum numbers of employees to be required on trains, **rail service may become cost-prohibitive between some states, negatively impacting communities and businesses.**

Evolution of Technology

As rail technology has improved over the last four decades, the need for multiple crew members on every train has diminished greatly. End-of-train monitoring and control devices, improved wayside defect detectors, and remote controlled locomotives (with no crew member on board) used in freight yards have **allowed freight railroads to operate more efficiently with fewer employees, and improve safety performance.**

The U.S. trucking industry, supported by both federal and state departments of transportation, is aggressively pursuing similar technology applications. Currently, 39 states allow some level of automation on U.S. highways. Supporters of autonomous vehicles promote the elimination of human error as a means to greater safety. The same standards should be applied to locomotives.

OVER DECADES OF DECLINING CREW SIZES, RAIL SAFETY HAS CONTINUED TO IMPROVE AND THERE IS NO POSITIVE CORRELATION BETWEEN SAFETY AND THE NUMBER OF EMPLOYEES ON TRAINS.

Summary

ASLRRA will continue to be supportive and involved in the development of practices and procedures that lead to improved safety in the industry. Study results show no correlation between the number of employees on a train and overall safety. Therefore, there is no need for any state legislation in this matter.

The efficiencies allowed by tailoring the size of the crew to the requirements of the job enable increased spending on critical infrastructure improvements and employee development and training. New technologies have highlighted the shortcomings of legislated crew size.

ASLRRA OPPOSES LEGISLATION AT ANY LEVEL OF GOVERNMENT THAT MANDATES CREW SIZE.
