U.S. Department
of Transportation
**Federal Railroad
Administration**

Administrator

1200 New Jersey Avenue, SE
Washington, DC 20590

NOV 19 2013

Mr. Michael P. Melaniphy
President and CEO
American Public Transportation Association
1666 K Street NW, 11th Floor
Washington, DC 20006

Dear Mr. Melaniphy:

Thank you for your prompt response to my September 30, 2013, letter requesting that the American Public Transportation Association (APTA) summarize the steps that your members are taking to implement each of the recommendations contained in the Federal Railroad Administration (FRA) and Pipeline and Hazardous Materials Safety Administration's jointly issued Safety Advisory 2013-006.

We carefully reviewed your response and appreciate the effort that APTA has made to gather information from its membership. We also appreciate APTA's active participation in the three Railroad Safety Advisory Committee Working Groups that were established in response to the tragic Lac Mégantic accident to address transportation of hazardous materials, train securement, and appropriate crew size.

The FRA realizes that some portions of Safety Advisory 2013-006 do not directly apply to the APTA member railroads. However, FRA was pleased with the comprehensive response provided by APTA. Your organization advised that 22 commuter railroads responded to your request for information and indicated that other responses would be coming in. APTA reported that all respondents had accomplished the following:

- Reviewed the circumstances of the Lac Mégantic accident with their employees.
- Completed systemwide evaluations of locations where securement and other risks to unattended trains exist.
- Reviewed emergency directives and orders issued by Transport Canada.
- Reexamined and updated safety and security plans for transporting hazardous materials.

APTA also reported progress on the issues of crew staffing, removal of reverser levers, and evaluation of operational testing programs to procedures governing securement of unattended vehicles. Your membership took a variety of approaches to these issues, depending on their

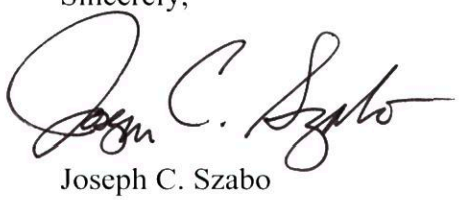
operating model and individual circumstances. FRA would appreciate an update of your summary actions by December 6, 2013, to include any late submittals.

APTA indicated that the recommendation for a review of crew staffing for trains transporting hazardous materials does not generally apply to APTA's members. FRA agrees with this statement. Nonetheless, our rail system is a complex and interconnected network of freight and passenger trains that requires that risk be reviewed in the context of the entire system. Therefore, it would be helpful for APTA to provide some insight on crew size. It is FRA's impression that all commuter railroads, except those with crew size waivers, operate with two or more persons assigned to a train. FRA would like confirmation that this is the practice amongst your members, and to know of any special circumstances where less than two crewmembers would be assigned to a train. We would also like that information to be submitted by December 6, 2013.

Your response to this request will also be posted on the FRA Web site to ensure complete transparency with the American public.

Thank you again for your cooperation and assistance on this important safety initiative.

Sincerely,



Joseph C. Szabo
Administrator