



**American Short Line and
Regional Railroad Association**

The Voice of America's Independent Railroads

December 6, 2013

Hon. Joseph C. Szabo, Administrator
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Szabo:

The American Short Line and Regional Railroad Association ("ASLRRA") is pleased to respond to your letter of November 22, 2013 concerning a specific request for information on the number of trains operated by a specific crew size.

As you know ASLRRA is the trade organization which represents 455 of America's Class II and Class III railroads in the nation's capital. It is the voice of America's small railroads. As a voluntary membership organization we have no capacity to compel individual railroads to provide information to us. Nevertheless, ASLRRA will endeavor to assist the Federal Railroad Administration (FRA) in obtaining the data you have requested.

We are willing to make the request of our members to provide information; however, our experience with these requests for voluntary information is that we will not receive responses from many railroads. We are also willing to meet with the FRA to determine precisely what information is desired so that we can ensure that we accurately seek the information needed. In that regard I should also note that the only statistics we have been able to obtain and cite in prior communications to you were originally obtained from and generated by FRA itself. I cannot give you assurance that what we gather by survey will be any more accurate than FRA's own data. And we are willing to share with you our membership list to assist you in any survey that you may wish to conduct for this effort and for any future safety efforts. One statistic we can cite with confidence is that 2012 was the safest year ever for U.S. railroads, beating all previous records.

The available data demonstrate that from 1980 to 2012 the train accident rate fell 80 percent, the rail employee injury rate fell 85 percent, and the grade crossing collision rate fell 82 percent. We believe that in the context of three decades of dramatic improvement in safety performance it is especially important that we work carefully and take the time necessary to collect accurate and complete data from which we can work together in confidence going forward.

Respectfully,

Richard F. Timmons, President
American Short Line and Regional Railroad Association