



# Brotherhood of Locomotive Engineers and Trainmen

*A Division of the Rail Conference — International Brotherhood of Teamsters*

## NATIONAL LEGISLATIVE OFFICE

25 Louisiana Avenue, NW, Room A-704 • Washington, DC 20001  
Phone: (202) 624-8776 • Fax: (202) 624-3086 • [tolman@ble-t.org](mailto:tolman@ble-t.org)

**JOHN P. TOLMAN**

*Vice President and*

*National Legislative Representative*

August 30, 2007

Docket Clerk  
DOT Central Docket Management Facility  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue, Southeast  
Washington, DC 20590

Re: Docket No. FRA-2007-28424

Dear Docket Clerk:

On May 7, 2007, Union Pacific Railroad Company (“UP” or “Applicant”) filed with the Federal Railroad Administration (“FRA”) an application for the discontinuance of the block signal system on UP’s Albert Lea Subdivision between mileposts 193.1 and 194.2. *See* DOT DMS FRA-2007-28424-1 (“Application”). On July 17, 2007, FRA published notice of the filing of UP’s application, soliciting comments thereon from interested parties. *See* FRA-2007-28424-3.

These comments are submitted by the Brotherhood of Locomotive Engineers and Trainmen, a Division of the Rail Conference of the International Brotherhood of Teamsters (“BLET”), which is the duly designated and recognized collective bargaining representative for the craft or class of Locomotive Engineer employed on UP. Consequently, the instant application would have a significant impact upon our members. For the reasons set forth below, BLET opposes granting the application.

We dispute UP’s assertion that the current block signal system “is no longer needed for safe train operations[s].” *See* Application at p. 1. UP’s application acknowledges that “[a]verage traffic volume is approximately 10 trains per day,” and, further, that the line is used to transport an “approx[imate] average of 31 hazardous loads per day.” *Id.* at p. 2.

However, the application fails to inform FRA that, among these hazardous materials shipments, are trains consisting exclusively of ethanol. Moreover, the application fails to advise that the northbound signal is located on a curve and if cars are in the yard, there is only about one car of visibility for a crew on an approaching train.

**DOT Docket Clerk**

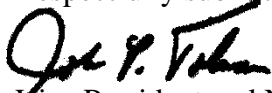
**August 30, 2007**

**Re: Docket No. FRA-2007-28424**

**Page 2**

There also are two cement plants with switch engines moving in and out of the area, and yard crews also work in the area transferring cars. Lastly, this location also is used as a crew change point. The operation at this location is significantly more complex than indicated in UP's application and, therefore, we believe the application should be denied in the interest of safety.

Respectfully submitted,



Vice President and National Legislative Representative

cc: Grady C. Cothen, Jr., Esquire, FRA Deputy Associate Administrator for Safety Standards  
and Program Development  
Thomas T. Ogee, UP AVP Engineering Design  
Pertinent UP General Chairmen  
Pertinent UP State Legislative Board Chairmen  
Thomas A. Pontolillo, Director of Regulatory Affairs