

Oppose Efforts to Mandate Train Crew Size

In the rail industry, crew staffing — particularly the number of persons in the locomotive — has always been established at the bargaining table. However, legislation and regulations have been proposed that would mandate a minimum of two persons in a locomotive cab. Any effort to require at least two-person crews lacks a safety justification; ignores the decades of safe and successful use of single-person crews at some U.S. freight railroads and in passenger and freight rail systems throughout the world; upends decades of meaningful collective bargaining between rail management and rail labor; and undermines the rail sector's ability to compete against less climate-friendly forms of transportation.

Previous decisions from the Federal Railroad Administration (FRA) found no basis to enact a regulation on train crew size. Railroad safety has dramatically improved in recent decades due to operating and technological advances. During the same time, train crew size has steadily decreased.

Crew size is not a safety issue.

- **There are no data showing two-person crews are safer than one-person crews:** Single-person crews are widely used on systems around the world and on many U.S. short line railroads and passenger trains. These railroads' safety record is comparable to two-person operations.
- **Life-saving technology called Positive Train Control (PTC) has been fully deployed on high-volume freight lines and on passenger lines:** PTC monitors speed restrictions, communications and track signals to prevent certain train-to-train collisions and derailments caused by human error, rendering the conductor's in-cab responsibilities redundant in many cases. As a result, conductors can be redeployed to support train operations from the ground. PTC is essential to modernizing train staffing operations.

Collective bargaining works for crew staffing and safety.

- **Rail staffing has long been a matter of collective bargaining and should remain that way:** Changes to agreements regarding crew size are subject to existing statutory collective bargaining processes under the Railway Labor Act.
- **Safety gains in the rail industry coincide with reductions in crew size:** With prior technological advancements, freight railroads have reduced crew sizes from five to three to two. These reductions have coincided with safety improvements throughout the industry, particularly for incidents caused by human error.

Railroads must be able to innovate and compete.

- **The long-term viability of freight rail depends on the industry's ability to adapt and compete in a rapidly changing transportation sector:** Technology and modern staffing models are making freight railroads safer, more efficient and more productive. Crew size mandates would hinder these gains and divert traffic from rail to trucks, which are less fuel efficient, create congestion and further damage the nation's highway system. Further, a freeze on railroad innovations makes no sense at a time when autonomous trucks are receiving so much support from policymakers.

Encouraging innovation is the solution.

Policymakers must reject efforts to require at least two people in a locomotive cab and instead encourage innovation. Freight railroads must be allowed, in partnership with rail labor under long-standing collective bargaining processes, to determine operating models most conducive to optimal safety and service performance. Federal and state mandates lacking empirical justification must not be made the law. Railroads are committed to good faith negotiations on issues — including the implementation of new technologies and train operations that maximize safety benefits and efficiencies — with their employees in the forum in which those issues have historically been resolved.