Alertness Strategies in the Rail Industry:
Managing the Challenges of 24-Hour Operations

Kellogg Conference Center
at Gallaudet University

November 14–15, 2007

Workshop Panel: Perspectives on Fatigue Management Plans

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On behalf of BLET National President Don Hahs, Vice President and National Legislative Representative John P. Tolman, and more than 33,000 BLET members, I’d like to thank Pat Sherry for putting together this workshop, and Karen Philbrick for her work in organizing things this week.

I also would like to thank all of you who took the time to attend this workshop. Many of you traveled much further than I did, and I believe the BLET membership will benefit greatly from your participation.

In preparing for this week’s program, I had occasion to review John Pollard’s February 1991 Report entitled Issues in Locomotive Crew Management and Scheduling. Section 4 of that report included the following initiatives for change, which form the core of a successful fatigue management plan:

- advance notice of train departure time;
- predictable crew rotation;
- improvements to crew information systems;
- extra rest options; and
- calling windows.

While some progress has been made concerning these subjects in the nearly 17 years since the Pollard Report, the related issues of alertness and fatigue continue to be such an area of concern that — within the next year — Congress likely will force everyone to step up the pace of their work in a significant way. Our approach continues to be that any legislative initiative must include a way for labor and management to craft programs that address the particular needs of a given location or area.

In our view, the cornerstone of a successful fatigue management plan is the empowerment of the individual worker. Our members are expected to make maximum use of rest opportunities; indeed, when we fail to do that we have been criticized, as the NTSB did in its report on the 2004 Macdona, Texas, collision. At the same time, however, railroads have obligations of their own when it comes to fatigue-abatement; the burden cannot be placed upon just the workers.

Our response to Congress increasing the time off duty between tours from 8 hours to 10 hours has been to point out that fatigue would be much easier to counter if someone received a 10-hour call before reporting for work instead of 10 hours guaranteed time off duty after completing work. This system would have two advantages over the current legislative proposal: (1) it wouldn’t hamstring yard and commuter operations, and (2) it would eliminate “short calls” as a fatigue factor.

1 See DOT/FRA/RRP-91-01.
Of course, whenever the subject of an 8-hour call or a 10-hour call is raised, the industry responds that it would be required do to the extremely difficult, if not the impossible, to provide such advance notice.

I’ve always thought that this was a curious complaint, because I remember that when I hired in New York City just about 35 years ago — on what once was the Pennsylvania Railroad’s New York Division — we had a handful of freight trains that had timetable schedules. While these schedules were for evening operation, there were scheduled freight trains on the Northeast Corridor as recently as 3½ years after we put a man on the moon.

Now, one of the great things about the Internet is that you can find some amazing information. For example, I was able to download the PRR’s Timetable No. 9 for the Philadelphia Terminal Division, which went into effect at the spring change of time in 1955.

The “PT” — as it was called — was a really small division. Its Main Lines ran 14.3 miles northward, 21.3 miles westward, and 6.3 miles southward from Philadelphia. The total Main Line trackage for the entire division was 41.9 miles, and there were a number of branches and extensions, about half of which provided alternate routes into and around 30th Street Station.

Passenger service was a mix of conventional and MU commuter trains. Some 500 different train symbols operated in a typical week, with over 3,500 total trains. Two facts that amazed me are these: (1) the timetable contained the same number of scheduled freight train symbols as conventional passenger train symbols (69); and (2) nearly 425 of the 3,500+ scheduled trains were freight trains, comprising almost 12% of the total.

That was on one small division, over 50 years ago. There were no computers, and there was no GPS. “Just-in-time” manufacturing — which places a premium on timely delivery — hadn’t been conceived. Many aspects of railroad operations were still in the “pencil and paper” age, although most of the PT was equipped with ABS.

Yet, during that relative technological Stone Age, the PRR did — on the busiest passenger rail corridor in the nation — what many say is impossible, even without interference from passenger trains. Is it that we can’t do it, or just that we haven’t really put our minds to doing it? After all, we’ve had the ability to jointly petition the FRA for a waiver of the law for over 13 years, now, but we’ve never come close to a fatigue-mitigation agreement that would justify a waiver.

You want your workers — and we want our members — to come to work as rested and refreshed as possible. But that goal cannot be achieved unless the men and women who keep this industry running 24/7 are given the tools to make success possible … that just ain’t happening today.
So many of the factors that cause and exacerbate fatigue — from dropped turns, to bad line-ups, to manpower shortages — are abated, if not eliminated, by providing for rest after call, rather than rest after work. There will be no quick or easy way to get there, but history teaches us that it can be done if we really want to do it.

And if you combine a 10-hour call with extra rest options — that are set up to prevent abuse and/or sharpshooting — then you’ve touched all the bases that Pollard laid out in 1991, and giant strides will be made in combating fatigue and promoting optimum alertness. Thank you.