



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

Memorandum

*Watch to
ensure Blue signals
displayed*

Date: **SEP 11 1991**

Reply to Attn. of: **OP-91-09**

*OP Inspector
Responsibilities*

Subject: **T-10 Operating Practices Inspector Responsibilities**

From: *ER English*
Edward R. English
Director, Office of Safety Enforcement

*Not Complain
Practices because
no Railroads
Employed*

To: **Regional Directors
Deputy Regional Directors
Supervisory Railroad Safety Specialists - Operating Practices
Operating Practices Inspectors**

FRA's track geometry car T-10 was involved in a serious incident recently that resulted in a near collision with a freight train. At the time of the occurrence, T-10 was making a reverse movement on a main track under the direction of the railroad locomotive engineer pilot. After backing about 5 miles, T-10 proceeded past the home signal at an interlocking displaying a stop indication and through a trailing point switch lined against movement. The T-10 operator was at the controls at the front of the car responding to radio instructions from the pilot. An FRA operating practices inspector and the Ensco survey director were in the presence of the pilot in the rear cabin of T-10 at the time of the incident. The route through the interlocking was lined for a freight train approaching on an adjacent track. The engineer of the freight train observed T-10 fouling the route and stopped his train short of a collision. There was no derailment or personal injuries, however the switch was damaged by T-10 as a result of the run-through. The pilot later admitted that he looked at the wrong signal approaching the interlocking and took it as his governing signal.

This incident again points out the need for FRA inspectors to be fully cognizant of all operating conditions effecting T-10. The reason we assign operating practices inspectors to T-10 is to protect against situations such as noted above.

In order to accentuate OP inspector responsibilities relative to T-10 operations, we are reemphasizing specific instructions for operating practices inspectors while assigned to T-10. Inspectors will become familiar with and comply with all instructions.

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SUPPLEMENTAL INSTRUCTIONS FOR FRA OP INSPECTORS
ASSIGNED TO THE ATIP T-10 VEHICLE

The following instructions are a supplement to any applicable Federal and carrier rules, as well as Appendix C. For purposes of these instructions, a main track is any track outside the confines of a yard.

1. The control and authority for T-10 operation rests with FRA, not Ensco. The senior on-board FRA inspector/supervisor will be the final decision making authority on the proper course of action. Contact with the regional director or his designee will be made at the earliest practical time should an unusual or unplanned event occur which materially changes T-10 schedule or operational capability.
2. The OP inspector is responsible for daily coordination with railroad dispatchers to ensure T-10 operating instructions are understood and to resolve any questions or concerns regarding T-10 operations.
3. T-10 operating instructions will be read to each engineer pilot by the Ensco crew chief in the presence of the FRA OP inspector prior to T-10 movement.
4. The engineer pilot will be asked by the OP inspector if he/she fully understands the instructions and confirm that the vehicle is being operated as a train by the railroad.
5. Prior to operation of T-10 on the main track, the OP inspector must ascertain through the engineer pilot the method(s) of operation in effect on the route to be travelled. Reference to applicable operating documents will be made to confirm such information as applicable.
6. In the event reverse movements are necessary on the main track, when conditions so warrant, OP inspectors will instruct the car operator to change ends and operate from the rear of the car. Conditions which will require changing ends include movement through interlockings, movements over multiple highway-rail crossings, or movements of a significant distance (2 miles or more).
7. The OP inspector will communicate with the engineer pilot (or the engineer and conductor when towed) and will examine pertinent qualification documents as required under 49 CFR Part 240. The pilot must be currently qualified over the routes and railroads(s) involved.

8. Prior to operation of the vehicle on the main track, the OP inspector will personally inspect applicable forms, bulletins, orders or clearances for accuracy and to ensure the vehicle is being operated as a train. If other FRA employees are aboard, they will inspect these documents as soon as practical. The inspectors must not request or accept copies of these authorities until they are fulfilled or annulled. FRA inspectors are assigned to T-10 to ensure compliance with Federal rules, carrier rules and T-10 operating instructions by carrier and Ensco employees.
9. FRA inspectors are not to be directly involved with the movement of the vehicle insofar as operating the controls, talking over the radio regarding movement authority, or adjusting/operating any vehicle survey computers or equipment. FRA OP inspectors are to be aware of T-10 movement authorities at all times and will question the pilot if any doubt exists regarding route, signal indication, speed or other operational element. If necessary, T-10 will be stopped until a clear understanding of movement intent is achieved by the OP inspector.
10. Prior to operation of T-10 on each segment of main track, the OP inspector will review and note the limits of each applicable movement authority, and applicable method of operation involved. When practicable, other FRA personnel on board will also review each authority.
11. When T-10 is in motion, FRA personnel are to limit conversation with the engineer pilot and T-10 operator to matters of official business related to the movement of the car. Idle conversation or small talk while T-10 is in motion is inappropriate and distracting.
12. All FRA employees aboard will jointly determine from appropriate persons all relevant speed restrictions which will be encountered enroute. All FRA employees aboard will assure compliance with each speed restriction. The internal communication system may be used for this purpose if appropriate.
13. The OP inspector will assure the engineer pilot notifies the vehicle operator of the limits of authority and authorized speeds a sufficient distance in advance of any speed or movement restrictions.
14. T-10 may be operated within the confines of a yard provided the movement is approved by proper authority and is piloted by a railroad employee qualified on the physical characteristics.

15. T-10 must not be operated on the main track unless a qualified engineer is piloting the movement. This requirement also applies within yard limits.
16. Train orders, DTC, TWC, MBS or other mandatory directives must be transmitted and received in compliance with 49 CFR 220.61. For purposes of this instruction, all references to crew members apply only to the engineer pilot. If the engineer pilot cannot remain in the control cab while receiving such directives, the vehicle must be stopped.
17. In the event the T-10 Ensco operator is to be relieved due to hours of service constraints, the railroad engineer pilot should be utilized to continue car operation to a point of final tie-up. Should the pilot be prohibited from operating the car, the survey should be stopped at a suitable point short of scheduled tie-up or a locomotive should be requisitioned for tow. (This contingency is one that should be addressed at the beginning of the survey to allow for ample planning). If, in the opinion of the senior FRA official, the engineer pilot is capable of continuing T-10 operation, sufficient supervised training time (45 minutes to 1 hour) should be allowed prior to Ensco operator duty expiration.
18. If the operating authority does not include permission to operate on the main track within yard limits, FRA employees must ensure the applicable timetable or other instructions are complied with before entering such limits. This applies when necessary to operate either with or against the current of traffic. The carrier employee in charge of the main track within these limits must specifically state that authority to operate within yard limits has been granted.
19. Ensco employees are required to comply fully with FRA Blue Signal Regulations when inspecting, repairing, servicing or testing the vehicle. Ensco employees may request that a railroad employee operate a railroad switch or derail, but the Ensco employee must apply the blue signal and locking device. Although instrument verification (IV) checks are not covered by blue signal regulations, a blue signal must be displayed on or near the control stand at a readily visible location when they are conducted if the vehicle operator is not seated at the controls.
20. Each OP Inspector must complete and submit an FRA F6180.65 for each day assigned to the vehicle. Deficiencies identified on the F6180.65 will apply to the railroad. If more than one railroad is involved on any particular day, a separate report must be completed

Some staff as if you were riding a train

for each railroad. These reports are to be submitted through regular channels.

21. If problems or incidents occur enroute, they must be detailed in a narrative memorandum to be prepared by the OP inspector. These narratives must be submitted to the Director, Office of Safety Enforcement (RRS-10). All deficiencies involving the vehicle, railroad pilot/employees, or Ensco employees will be detailed on this narrative.

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