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GENERAL COMMITTEE GO-851
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March 5, 2009

D.R. Menefee
Director, Train Accident Prevention
CSX Transportation, Inc.
500 Water Street, J260
Jacksonville, FL 32202

SCANNED & SENT

RE: RCO Training Program

Dear Mr. Menefee:

During a February 20, 2009, meeting with Vice Presidents Mike Pendergrass, Cindy Sanborn, and Steve Crable, we raised concerns over the quality of RCO training. In part, these concerns were sparked by notification that the Carrier would no longer be using craft personnel as instructors in the RCO training program and that managers holding RCO certificates would conduct the training.

We have no objection – either in principle or contractually – to increasing the attention of local managers to the training process and would, in fact, welcome their more active involvement. Managers who participate in the training process, rather than just handle the formal paperwork and final testing, will certainly take greater ownership of the results of the training, get to know their employees better, and thus be better prepared to help those employees become better at their jobs. In addition, their increased familiarity with the remote control equipment and operations will enhance their ability to resolve problems and answer questions expeditiously.

That being said, we firmly believe that individuals who have worked as RCOs and have actual switching experience are the best instructors. While some managers have that experience as part of their background, many today come straight from “the street” through the management training program. We are not questioning their intelligence or their supervisory capabilities; we simply do not believe they can ably pass along knowledge with which they have no direct experience.

It would appear that the Carrier itself has recognized this reality in its program¹, revised as recently as August 2008 and developed to meet the guidelines of 49 CFR Part 240.

¹ CSX Transportation, Inc. *Locomotive Engineer and Remote Control Operator Qualification Programs*. Revised August 2008.

The basic RCO training program presented is an 80-hour course, the first week of which includes classroom and field instruction and the final week of which is “on-the-job” training under direct supervision.²

In Appendix A, Remote Control Operator Training – Program Overview, the “Course Timeline” reads:

Week One training will be delivered by DTRCO [Designated Trainer of Remote Control Operators] who meet the qualifications set for in the “Statement of Conditions for Training”.

The “Statement of Conditions for Training” specifies:

Candidates for DTRCO must meet the following minimum requirements prior to perform duties as a contract remote control instructor ... [m]ust be a certified and currently qualified remote control operator with sufficient experience in remote control operation.

Experience is defined in the CSX training program as “sufficient railroad and remote control experience to address operation requirements within the terminal. At a minimum, the candidate must have ***thirty*** starts as a remote control operator.” [Emphasis added.]

In cases where a regularly assigned remote control operator is used as a trainer in the OJT portion of the training, the CSX guidelines specify that he/she “must have at least 30 remote control starts in the terminal before a trainee may be assigned to them for training.”³

This acknowledgement that hands-on experience should be a prerequisite for any individual seeking to train another is simply sound wisdom and common sense.

While we agree that our regularly assigned RCOs would be appropriate as OJT trainers as defined by the CSX training program, we have concerns that these individuals are not being properly prepared to take on that responsibility and that the DSRCOs (Designated Supervisor of Remote Control Operations – a remote qualified officer) may not be ensuring “the integrity of the training program and full compliance with the administrative and training requirements” as outlined in the “Statement of Conditions for Training”.

The above-cited “Statement” mandates that “OJT trainers must have copy of the conditions for learning, task list, and required forms.” It further outlines the specific requirements of the field training process:

- *RCO trainers must conduct a detailed job briefing prior to beginning training activities and any time activities change. It must include but is not limited to the following:*
 - *Physical characteristics to include track length, slopes and grade, switch type and location, remote control zone/operator control zone/positive stop protection tracks (if applicable)*
 - *Capacity of each track to be used*

² We note that an additional five days of training is mandated where remote control operations require RCOs to perform a transfer air test prior to departure and operate up to twenty miles on main track.

³ Where an additional week of training is mandated due to the conditions outlined in Footnote 2, the program stipulates: “RCO trainees will be accompanied with a DTRCO during the OJT sessions”.

- *Permissions required for switching (if applicable)*
- *Any applicable operating, safety, air brake/train handling, or local rules that apply during the operation*
- *A qualified person must demonstrate each task at least once prior to asking the trainee to practice the task...*

The reports we are receiving from the field indicate that there is extensive use of OJT trainers during the second week of training, but these OJT trainers are receiving little or no direction. In addition, they are expressing concerns in some locations that the training process is limiting their productivity and they may face increased scrutiny and possible discipline as a result.

We have also received a disturbing report that the DSRCO at Savannah, a trainmaster with limited ground experience who conducted the classroom phase of the training beginning February 23, 2009, is observing his vacation in the “land down under”, having left the OJT trainers in charge of the trainees for the second week. This would appear to be the polar opposite of the type of program contemplated by the document submitted by CSX to the FRA.

We firmly believe that a team approach, which partners labor trainers with management trainers, not only conforms with the written CSX program, but to widely accepted principles of adult education, particularly in the field of health and safety. A report by the National Institute of Environmental Health Sciences (NIEHS) on “Minimum Health and Safety Training Criteria” stressed that adult learners respond better when they have the opportunity learn from their peers.⁴ A Centers for Disease Control publication noted: “Peers can be particularly influential, and should be utilized wherever possible.”⁵

Simply stated, this is because adults recognize the value of experience and respect those who have mastered their craft.

The labor-management team of instructors has this strength combined with the presence of a Carrier representative with the authority to interpret the rules and explain their concrete application. And this team demonstrates the shared interest in workplace safety.

It has been suggested that one of the concerns driving the elimination of the contract DTRCOs in many locations is the perception that labor trainers might undercut productivity and efficiency and promote slow-down tactics and even sabotage. We strongly take issue with this accusation. While we don’t rule out the possibility that there may be individuals – on both sides of the labor-management divide – that are more interested in promoting their own agenda than in conducting training, we maintain that the Organization has a vested interest in quality training of RCOs.

First and foremost, we want to make sure our operators have the skills necessary to protect their own safety and the safety of those in proximity to them. Second, we believe

⁴ National Institute of Environmental Health Sciences – Worker Education and Training Program. (2006). *Minimum Health and Safety Training Criteria: Guidance for Hazardous Waste Operations and Emergency Response (HAZWOPER), HAZWOPER-Supporting and All-Hazards Disaster Prevention, Preparedness, and Response*. Washington, DC: National Clearinghouse for Worker Safety and Health Training.

⁵ Franks, J.R., Stephenson, M.R., & Merry, C.J. (1996, October). Preventing Occupational Hearing Loss – A Practical Guide. *NIOSH Publication 96-110*. U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health. Retrieved February 17, 2008, from <http://www.cdc.gov/niosh/96-110.html>.

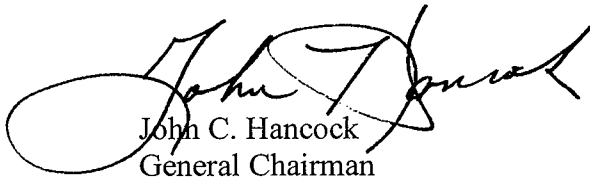
that an individual who is fully knowledgeable of the rules is many times less likely to find themselves on the receiving end of a discipline letter and less likely to need our assistance in defending themselves. Finally, we are proud of our craft and our traditions of professionalism and we expect that our members who serve as trainers and mentors to their fellow employees will conduct themselves accordingly. In a word, the union is the most ardent advocate of proper and quality training. The process of DTRCO selection that has been in place, which involved both union and management review of the applicants, allowed us a mechanism to prevent our own members from advancing any agenda in conflict with this.

Especially with the expansion of RCO operations in some locations to include industrial switching and the establishment of single-person remote control operations, we believe that it is even more important that the training program be carefully monitored, consistent, and of the highest quality. In addition, we are concerned about the seeming lack of refresher training for the large numbers of employees who have recently been cut back from engine service or who are returning to yard from road service after a lengthy period of time and being required to jump back into remote control operations.

It is our understanding that the Carrier takes the position that the annual operational check ride as a locomotive engineer is sufficient to maintain an individual's RCO certification and that an annual rules test and "qualifying run" is sufficient to maintain the qualification of a trainman who is not actively working in remote control operations. We believe this is insufficient to ensure a safe operation.

We request a meeting with your office, and would welcome the participation of CSX Labor Relations and perhaps representatives of the FRA, to discuss the current manner of implementation of the company's RCO training program and the related training agreements.

Very truly yours,



John C. Hancock
General Chairman

YRH:gmt

CC: James Stem, National Legislative Director, United Transportation Union
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