



U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

MAR 07 2017

Mr. Jody Cox
Chief Engineer Communications and Signals
CSX Transportation
500 Water Street, Speed Code J-350
Jacksonville, FL 32202

Re: Docket Number FRA-2016-0075

Dear Mr. Cox:

This letter is in response to CSX Transportation's (CSX) June 14, 2016, block signal application (BSAP) to the Federal Railroad Administration (FRA) seeking approval of the proposed discontinuance of control point (CP) Rule-511, and traffic control (TC) Rule-510 on the Plymouth Subdivision, Chicago Division, at Plymouth, MI.

CSX proposes to discontinue the traffic control system (TCS) currently in effect on portions of track between CP Beck Road, milepost (MP) CH27.0, and CP Seymour, MP CH148.17, and operate under track warrant control D 505 Rules. Signals would be removed and all power-operated switches would be converted to hand operation. The CP-511 Rule would remain in effect at CP Ann Pere, MP CH52.8. CP-511 and TC-510 Rules would remain in effect between CP EE Throwbridge, MP CH83.12, and CP Ensel, MP CH89.95, which would ensure that there is no operational impact to the Jackson & Lansing Railroad.

FRA received letters of opposition from a concerned private citizen, as well as numerous rail labor unions including the Brotherhood of Locomotive Engineers and Trainmen, Brotherhood of Maintenance of Way Employes, Brotherhood of Railroad Signalmen, and Sheet Metal, Air, Rail and Transportation (collectively, Labor). The Labor comments were consolidated into one letter and noted that train crews rely on signals to warn of train traffic ahead, switches not properly lined, and broken rails. These signals are not provided in dark territory, which unquestionably provides a less safe method of train operations. Labor states that their opposition to CSX's request is based upon concerns for both employee and public safety. This territory is very undulating with poor long-distance sightlines and the current signal system provides vital information to dispatchers, and operating and maintenance crews. Labor further notes that Congress has mandated that FRA utilize the highest degree of safety in the issuance of its safety rules. That standard cannot be met if this BSAP is granted.

The private citizen commented that this line is the only rail line connecting Grand Rapids, Lansing, and Detroit, the three largest cities in the State of Michigan. The commenter further stated that it is a vital line for all three cities for freight delivery and transportation, countless

large and small businesses, as well as their employees count on the freight inventory hauled along these tracks for their everyday needs. The commenter concluded that to do away with signaling and the broken rail protection would rob these people, industries and the natural environment around this line of this vital form of derailment protection, which is unsafe to the people and communities, as well as employees working on the tracks, equipment, and the trains themselves.

FRA notes that the discontinuance of the signal system bypasses broken rail protection, switch point alignment detection, eliminates train separation protection and identifying train locations. These factors, coupled with the level of hazardous materials moving on this line and the trains that meet and pass as well, do not support the safety of discontinuing the TCS and removing the signals in this area.

FRA's Railroad Safety Board (Board) carefully reviewed the BSAP, comment letters, FRA's field investigation findings, and FRA's technical staff findings. The Board concluded that for all of the reasons cited above by commenters and FRA staff, granting approval of the BSAP would not be in the public interest or consistent with railroad safety. As a result, FRA denies approval of this request.

In any future correspondence regarding this BSAP, please refer to Docket Number FRA-2016-0075.

If you have any questions regarding this letter, please contact Mr. Paul Weber, Railroad Safety Specialist, Signal and Train Control Division, at (202) 493-6258 or Paul.Weber@dot.gov.

Sincerely,



Robert C. Lauby
Associate Administrator for Railroad Safety
Chief Safety Officer