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October 21, 2019

The Honorable Elaine Chao
Secretary of U.S. Department of Transportation
1200 New Jersey Ave., S.E.
Washington, D.C. 20590

Re: Precision Scheduled Railroading

Dear Madam Secretary:

Within the last couple of years, a number of Class I railroads in the United States have begun implementing an operational strategy known as Precision Scheduled Railroading (PSR). The International Brotherhood of Electrical Workers (IBEW) believes that, in implementing PSR, these carriers' rapid, laser-like focus on consolidating services, deferring maintenance and reducing headcount is shifting the freight rail industry too far away from its traditional customer-service focus. Instead, these railroads are pursuing profit at any cost, even when the effort seriously risks the safety of workers and the public, as well as customer service and jobs.

For example, the rapid-fire layoffs that are resulting from PSR implementation have forced what remains of the workforce to deal with increasingly idle locomotives and equipment, reduced maintenance and shuttered facilities. The resulting, inevitable decay of this neglected physical infrastructure means that workers too often face unsafe working conditions and critical safety equipment is permitted to fall into disrepair.

Meanwhile, workers are being forced to cover for eliminated positions by taking on additional work that is often well outside of their craft and experience. In some instances, electrical workers are being forced to perform work of other craft workers. But more concerning is the fact that workers from other crafts are being forced to perform electrical work, highly technical and skilled work they are in no way trained or qualified to do. Often workers are being instructed to skip train maintenance work or inspections altogether and to focus instead on getting rail cars out of the yards.

In an industry that is already plagued by chronic fatigue, railroads implementing PSR are demanding increased mandatory overtime from their stretched-thin workers. This will most likely result in increased workplace injuries as the remaining workforce attempts to complete work at breakneck speed. In some instances, workers who are unwilling to put themselves or rail safety at risk face discipline for refusing managers' orders to sign off on incomplete work.



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The rush to put into service PSR optimized trains that are heavier and longer than ever jeopardizes the safety of not just rail workers but the public at large. The frontline workers represented by the IBEW fully expect that in a PSR operating system equipment breakdowns, on-track maintenance delays and even derailments will increase.

Finally, PSR consolidation of service locations and refusal to provide previous levels of service harms routes and shippers of all types and sizes, including rural customers for whom rail has been the sole freight transportation option.

In the first quarter of 2019, Class I railroads' net income and traffic increased over the same period in 2018. Therefore, the deployment of PSR is not in response to a loss of traffic or profits. Instead, it is an attempt to increase quarterly returns by cutting every available corner on safety, service, and labor.

On the other side of the equation is Burlington Northern Santa Fe Railway (BNSF). While not completely ruling out PSR, BNSF has decided to expand their business to their clients, the shippers, by investing in logistic centers, new facilities to better accommodate the shippers. So instead of cutting back on service, BNSF is investing and expanding, a much better route for both shippers and employees.

The IBEW, therefore, is seriously concerned about the sustainability of this business model and about PSR long-term effects on the rail workforce and services. Therefore, I ask for a robust analysis and monitoring of the safety of PSR operations, even when they do not violate the law.

Sincerely yours,

Lonnie R. Stephenson
International President

LRS:rmf

Copy to Ronald Batory, Administrator, Federal Railroad Administrator