



August 21, 2014

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Subject: Locomotive Safety and Inspection Rules



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Gentlemen:

The Railway Association of Canada (RAC), on behalf of its federally regulated members, Ontario short lines who are under agreement with Transport Canada (TC), and local railway companies who have provided us with a power of attorney will be soon filing proposed changes to *Locomotive Safety and Inspection Rules* under the Railway Safety Act.

These proposed changes will address crashworthiness standards on new and rebuilt locomotives as well as the requirements of ditch lights on locomotives.

On September 12, 2013 Transport Canada asked the RAC and its members to revise the Locomotive Safety and Inspection Rules to incorporate the AAR Standards S-580 and S- 5506 to apply to new and remanufactured locomotives.

The proposed changes to the rule would address the Transportation Safety Board recommendation R13-03 as well TC's response to the recommendation dated July 21 2013. This change would also ensure that the Canadian rules harmonize more closely with the current Federal Railroad Administration regulations.

The second change to the rules is to address Item 16.2.

The current rule as it is now written is in conflict with the *Canadian Railway Operating Rules* (CROR) which was approved by the Minister on February 26, 2008. The CROR allows "Transfers" to operate on main track without ditch lights.

To date, the industry is not aware of any accidents which may have resulted due to the absence of ditch lights on a transfer movement.

Specifically, the proposed change to the *Railway Locomotive Inspection and Safety Rules* would involve Item 16.2 which currently states "leading locomotives, other than in designated and/or yard service, must be equipped with ditch lights or a suitable alternative that is filed with the department meeting the following design criteria".

Under the proposed change we would like to include transfers as not requiring ditch lights or a suitable alternative.

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