

**Before the  
SURFACE TRANSPORTATION BOARD**

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**STB EX PARTE NO. 671**

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**RAIL CAPACITY AND  
INFRASTRUCTURE REQUIREMENTS**

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**UNITED TRANSPORTATION UNION'S  
WRITTEN SUBMISSION**

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United Transportation Union (“UTU”) respectfully submits its written submission pursuant to the Surface Transportation Board's (“STB”) March 6, 2007 Notice in this proceeding regarding rail capacity and infrastructure requirements. UTU is the United States’ largest rail labor organization. UTU represents over 80,000 workers, who include all train service employees on the Class I freight railroads. As a result ,UTU has a great interest in this proceeding.

In response to the STB’s request for views on these subjects, UTU emphasizes that better training and more staffing are the two easiest methods “to ensure the development and continuation of a sound rail transportation system.” These two actions can help to solve any capacity constraints on the United States rail system. Without proper training and adequate staffing, the rail system simply cannot function at its highest levels. UTU believes that a priority should be placed on the improvement of these two areas of operation and urges the STB to closely examine their importance.

UTU has consistently asked the nation’s Class I freight railroads to hire more operating employees and to improve the training provided to these individuals. Better implementation of both of these policies would greatly enhance the productivity of the rail industry’s infrastructure.

First, hiring more operating employees clearly would improve rail system capacity since it would eliminate employee shortage problems, which would then create a more fluid system. The

number of employees needed to operate the service is further impacted by hours of service laws which limit employees' work time. The carriers clearly need more employees to ensure that their system can be operated at full capacity, which can easily be solved by more hiring.

Moreover, with more adequate staffing, rail employees will be better rested and operate more safely. The improvements in safety alone by better rested employees will result in fewer incidents on the nation's rails, which will then permit a freer flow of traffic on the system. This fluidity will allow rail carriers to run more trains since tracks are less likely to be blocked by accidents or other matters.

Similarly, better training of operating employees will improve rail capacity based on this same logic. Better trained employees will only make the nation's railroads operate more fluidly, which will result in less operational congestion on the nation's rail system. These better trained employees will also be able to move trains faster which will improve rail capacity. As a result, UTU also urges the STB to look into how better training can improve rail capacity.

The nation's railroads also agree with the logic behind more hiring and training to improve rail capacity. Association of American Railroads President and Chief Executive Officer Edward R. Hamberger testified as follows:

Rail capacity is a function of personnel in addition to infrastructure, and railroads have been aggressively hiring and training crews to expand capacity. After decades of steady decline, rail employment has been on the increase since 2004. According to STB data, overall Class I employment in April 2006 (the most recent month for which data are available) was 3 percent higher than in April 2005 and 7 percent higher than in April 2004.

Hearing on Economics, Service, and Capacity in the Freight Railroad Industry before the Senate Subcommittee on Surface Transportation and Merchant Marine of the Senate Committee on Science,

Commerce and Transportation (2006) (statement of Edward R. Hamberger, President and Chief Executive Officer of Association of American Railroads). The railroads clearly acknowledge here the importance of adequate staffing and more training to improve rail capacity. The UTU believes an even greater increase in hiring and training will only further improve rail capacity.

These improvements in rail capacity brought about by better training and more hiring can be made without more investment in rail infrastructure. This method of improving capacity is obviously the ideal way to enhance the nation's rail system.

Respectfully submitted,

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