

that we will be able to impart technical research knowledge to keep our field force aware and abreast of technological problems that may be contributing to the constant annual rise in train accidents.

We have not and do not plan any appreciable degree of change in our present highly qualified staff of 22 regional supervisory personnel. All of the supervisory positions at the regional office level are filled by personnel with many years of practical experience in the field of railroad safety and are made up of a regional director and two regional supervisors in each of the seven regions. In addition, due to the size of the territory comprising region No. 5, we have a field supervisor located in Kansas City, Mo. One supervisor in each of the regions is responsible for safety appliance hours-of-service inspections, locomotive inspections, and signal and train control inspections, respectively.

We would also like to call to your attention that the majority of the supervisors are working supervisors, who in addition to their supervisory responsibilities perform regular inspections, accident investigation work and other related duties in the same manner as our regular field inspectors.

The regions in turn report to the Bureau of Railroad Safety's Washington office where we feel we have the capabilities in technical and enforcement knowledge to properly analyze the results of our field inspections.

3. The safety inspection program should be headed by a technically qualified, experienced safety inspector supported by a minimal staff of highly qualified specialists.

Individual safety inspection programs conducted by the Bureau of Railroad Safety in its General Safety Division, Locomotive Safety Division, Signal and Train Control Division and the soon-to-be-established Hazardous Materials Division are all headed by recognized experts in their particular fields of endeavor and are supported by an absolute minimal staff of qualified specialists.

4. In the regions, safety inspectors should be free from conformity with office type procedures, from putting in their time on a 9-to-5 basis, from filing projected itineraries, and from any other administrative requirements which prejudice their ability to exercise their responsibilities as safety inspectors in any way. Safety inspectors are free from conformity with office-type procedures and rarely spend more than 1 or 2 days per month in their respective offices. In general, we expect our inspectors to abide by regular assigned office hours on the few days spent wholly in their offices. Exceptions are made, however, if the inspector has performed or plans to perform special night duty. We find it necessary to continue to require itineraries of anticipated travel to permit us to contact inspectors for emergency assignments such as serious train accident investigations, complaints, etc. The individual inspector is at liberty to revise his travel plans as he sees fit, while on itinerary, to properly perform his duties; however, when time permits he is required to advise of changes in travel for the aforementioned reasons.

B. The IOC accident-reporting procedures should be overhauled so that the categories and classifications have direct affirmative value to safety inspection and to railroad-accident-prevention programs.

A research contract was recently let to Texas Transportation Institute for a study of grade-crossing reporting procedures including the use of form "T" and supplement to "T" reports now presently required by FRA reporting rules. (Estimate 18 months for TTI to complete their study and issue a report of findings.)

Other studies are under consideration to review all FRA accident reporting procedures; however, we are unable to furnish firm completion dates at this time.

C. The ICC should actively promote the adoption of effective employee safety programs on all American railroads.

Lack of jurisdictional authority has seriously limited our efforts to promote the adoption of effective employee safety programs. An exception to this rule was the recent adoption of an employee safety program by a class I railroad through combined efforts of encouragement by Washington BRS staff members working in close cooperation with the carrier and our regional field staff.

Proposed legislation recently introduced by the Department of Transportation (H.R. 16980) would give the Department authority to set standards for effective employee safety programs on all American railroads.

D. The penalties provided for violations of safety statutes should be used more effectively.

Anticipated benefits under the Claims Collection Act of 1966 may prove to be a very effective deterrent in the violations of safety statutes.