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November 13, 2017

Mr. Michael Hiller  
Railroad Accident Investigator | Investigator in Charge  
National Transportation Safety Board  
490 L'Enfant Plaza SW,  
Washington, DC 20594

**RE: Graettinger, IA investigation/post accident work**

Dear Mr. Hiller,

In response to the questions you raised during our November 9 phone conversation, please find below the additional information you requested.

1. YTD regional gangs have installed 8,605 cross ties since the derailment in March (4,415 on the Estherville Sub, 2,195 on the Ft. Dodge Sub, and 1,995 on the Tara Sub).
2. Union Pacific's 2018 capital program, though Board Approval has not been provided as of today's date (Board of Directors meet this week – November 15<sup>th</sup> and 16<sup>th</sup>) includes the Grain Line cross tie program (143k ties going in the Estherville, Ft. Dodge, Laurens, and Tara Subs).
3. Included in the 2018 capital program, all bridge approaches on the aforementioned Subdivisions will be fortified with 10' approach ties.
4. UP has reduced all 30mph subdivisions to 25 mph (class 2) on these Grain Lines.
5. UP has reduced the portion of the 49 mph subdivision to 40 mph.
6. UP has increased rail detector car test frequency on the Grain Lines from once per year to twice per year.
7. UP is on plan to complete all of the requirements of the FRA Compliance Agreement by the end of the year.
  - Track Inspections generally increased per the FRA Compliance Agreement, including additional track inspectors, GRMS testing, geometry car inspections, and rail detector car inspections.
  - Specifically, Union Pacific increased track inspections on Class 3 track by one additional test per year. Mainline and siding inspections increased from twice annually to three times per year.

Finally, you asked if Union Pacific believes the recent FRA Compliance Agreement has had a favorable effect on the safety of the railroad. From our perspective, the Compliance Agreement is not the genesis for improvements to the railroad's infrastructure, but has led to increased awareness of quality



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inspections. The improvements to the railroad's infrastructure can be attributed to understanding the cause of the Moiser derailment, mitigating similar conditions across the network, and from the subsequent corrective actions Union Pacific initiated post-derailment, most of which were later incorporated into the Compliance Agreement six months after the incident.

I hope these responses satisfy your requests. Should you require additional information, please do not hesitate to contact me.

S

Ronald W. Loomis

