



James Schwichtenberg
Vice President Safety

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August 30, 2023

Via e-mail: [REDACTED]

Amit Bose
Administrator, Federal Railroad Administration
U.S. Department of Transportation, FRA
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: CSX's Response to the FRA's letter dated August 21, 2023

Dear Mr. Bose,

This letter responds to your correspondence dated August 21, 2023 directed to Mr. Hinrichs concerning recent industry safety trends. CSX shares FRA's concern with the recent increase in catastrophic industry accidents, and much like FRA, CSX refuses to accept the status quo. That is why CSX has already taken prompt action to conduct a thorough and comprehensive review of our training programs, qualification processes, Operating Rules, operational testing program, and other related safety programs and implement updates as appropriate. Below is a summary of actions CSX has already taken, and an outline of additional plans to further strengthen CSX's safety programs.

We are acutely aware that two of the accidents referenced in your August 21 letter occurred at CSX. The loss of conductor trainees Derek Little and Travis Bradley were tragic and stark reminders of the unforgiving nature of the railroad environment. We have thoroughly reviewed the circumstances of these catastrophic accidents across all levels of CSX's Operating Department. Most recently, after the August 6 accident, CSX conducted an immediate safety stand-down by returning all trainees to their home terminals. There, managers and safety leaders reviewed all applicable rules and procedures involved in the accident, and trainees performed additional field training around close clearances. CSX shared this trainee stand-down plan as well as excerpts from the training presentation with the FRA on August 8, 2023.

These recent accidents have led to a number of additional immediate changes at CSX. In particular, we added a fifth week of training to phase I of our instructional program that occurs at our operational training center in Atlanta, Georgia. This additional training week focuses on hands-on, real-world operational scenarios that we believe will better prepare our new-hires for their phase II on-the-job training (OJT). Regarding phase II OJT, as of August 27, field managers must ensure that all trainees are subject to a *minimum* of one field observation per week – this ensures more frequent check-ins with trainees and monitors skill development and interaction between manager and trainee. Moreover, CSX issued operating instructions that require employees to contact their supervisor if a trainee and a conductor with less than one year of experience are assigned a work shift together. If possible CSX will move that trainee to another assignment with a more tenured employee. Further, CSX is looking for alternate means of scheduling crews to avoid pairing trainees with junior conductors – however, some assignments are naturally held by lower



seniority employees. These assignments may need to be worked by the trainee for physical characteristics and other regulatory requirements. CSX is committed to working through this important issue.

CSX has also reevaluated our trainee-mentor program. In the coming weeks, CSX will be sending all designated mentors to our operational training center in Atlanta for training focused on effective mentorship. We also added four field managers (one per operating region) who will work with the mentors and local managers on trainee development. Conductor mentors will be encouraged to enter notes and comments – both positive and critical – of conductor trainees into our systems to provide better and contemporaneous feedback about trainees.

Additionally, CSX completed a review of our Phase II (field training) in each supply point and made a series of modifications. In many locations we have added additional ‘trips’ based on employee feedback to help ensure trainees feel confident in their skills prior to marking up. To help ensure CSX identifies and chooses only the best candidates, we have also reinserted frontline managers into our interviewing process. Taken together, the aforementioned immediate actions will help ensure that conductor trainees receive the training, coaching, mentorship, and appropriate feedback they need to become successful employees once they are fully marked up at CSX.

Regarding additional items specifically noted in your letter and not already addressed above, CSX has reviewed each identified Safety Bulletin with frontline managers and relevant field employees and continues to stress the importance of complying with CSX’s ‘Critical Rules.’ Critical Rules include, among others, rules around protection of shove moves, leaving equipment in the clear, securing equipment, properly riding, mounting and dismounting equipment, and traversing safely between equipment. CSX is also conducting a comprehensive review of its Program of Operational Tests to identify potential areas of refinement and improvement.

Finally, CSX echoes FRA’s call to implement a Confidential Close Call Reporting System (C3RS), and remains committed to participating in the C3RS Railroad Safety Advisory Committee working group, which has been meeting over the past several months to both review the current program and develop a regulation that makes meaningful improvements to this important program. As noted in last week’s letter from AAR, CSX believes we have proposed a program that is balanced and allows for more coaching and learning than the aviation industry’s program. We look forward to collaborating with FRA on that rulemaking process and implementing a C3RS system that builds upon the policies and systems that CSX employees already have at their disposal to report safety concerns in a confidential manner.

As CSX has reiterated in other correspondence, we appreciate FRA’s safety-critical role in protecting CSX, its employees, and the public generally from railroad accidents and incidents. To that end, we look forward to partnering with FRA and labor organizations to make further enhancements to CSX’s safety programs to avoid accidents like the ones that occurred recently. Our goal remains the same - to be the safest railroad in North America.



Should you have any questions about CSX's response, please do not hesitate to contact me.

Regards,



James Schwichtenberg

cc:
Jennifer Homendy, Chair, NTSB
Ian Jefferies, President & CEO, AAR