



July 17, 2009

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Division Manager, Human Performance
QinetiQ North America
Technology Solutions Group
VIA Electronic Mail

Dear Ms. Gertler,

Please accept the following suggestions regarding FRA's proposed information collection activity (OMB Control No. 2130, FRA-2009-0001-N-11) filed jointly by the Brotherhood of Locomotive Engineers and Trainmen and the United Transportation Union in the above captioned matter. We fully support this information collection with the following revisions.

Suggestions for the Daily Log

Suggestion #1 - Page #4

Sleep periods (Complete Daily)

Revise bolded instructions, "You may report a nap concurrently with work, limbo time or interim release if this occurs."

Suggested language, "You should report all naps that you take during on-duty time, limbo time or interim release."

Suggestion #2 – Page #8

Instructions for T &E Service Employee Log

The last sentence of the second paragraph should read the same as the language in suggestion number 1 above.

“You should report all naps that you take during on-duty time, limbo time or interim release.”

Suggestion #3 – Page #9

Sample Entry

When referring to a job or duty tour we suggest using the term assignment (i.e. split assignment”) rather than shift.

The language in the sample text should be broken into two examples, one for split assignments and one for non-split assignments, which should also be defined.

Example A – Split Assignment. These are assignments that span more than 12 hours from on-duty time to final release time and contain a legally required “interim period of release” (4 Hour break)

- 1) You wake at 05:00
- 2) You commute from home to work between 06:00 and 07:00
- 3) You go on-duty and (work) between 07:00 and 11:00
- 4) You go on an Interim period of release between 11:00 and 15:00
- 5) You nap away from home between 11:30 and 14:30
- 6) You go back on-duty and (work) between 15:00 and 19:00
- 7) You commute from work to home between 19:00 and 20:00
- 8) You sleep at home between 22:00 and 05:00

A sample activity log should be displayed for this split assignment.

Example B – Straight through or Non-split assignment. These are assignments that span less than 12 hours from on-duty time to final release time and do not contain a legally required “interim period of release” (4 Hour break). They usually include assignments such as yard, protect and revenue road assignments.

- 1) You wake at 0:500
- 2) You commute from home to work between 06:00 and 07:00
- 3) You go on-duty and work between 07:00 and 16:00
- 4) You nap away from home between 10:30 and 12:00
- 5) You commute from work to home between 16:00 and 19:00
- 6) You sleep at home between 21:00 and 05:00

A sample activity log should be displayed for this non-split (straight) assignment.

Suggestion #4 – Page# 12

This page should include the following questions for extra list employees

A) For Unscheduled Assignments (extra list)

a. _____ Timed called

b. _____ On-Duty time

B) Type of service performed this day:

_____ Commuter

_____ Intercity

_____ Long Haul

C) Type of assignment this day:

_____ Split assignment

_____ Straight (Non-Split) assignment

Suggestion #5 – Page#18

Q5 – What type of assignment are you currently on?

Delete options for; “Passenger or commuter service”, “Local Freight” & “Road Freight”

Add options for:

_____ Straight assignment (regularly assigned, No break)

_____ Split assignment (regularly assigned W/ 4hour Break)

_____ Relief assignment all same shift

_____ Relief assignment changing shifts

_____ Extra List assignment

_____ Hybrid - See Amtrak rule (9J) some regular days and some extra days

Q6 – My current position is

Add option for:

____Asst. Cond./Ticket Collector

Suggestions for the Background Survey

Suggestion #6 – Page#19 &20

Sleep/Rest Arrangements

Revise statement: Please complete this section if your assignment contains any opportunity for rest between your on-duty time and your final release time.

In Item (1)

- 1) Delete the term “camp car”
- 2) Add a fourth choice
 - a) ____I go home to sleep

Add new Item (3)

If you are resting at an away from home terminal or a company provided point of interim release use this scale to rate the following statements

- 1) 1- Strongly agree
- 2) 2 – Agree
- 3) 3 – Neither agree or disagree
- 4) 4 – Disagree
- 5) 5 – Strongly disagree

- 1) I am able to switch off completely during my break. _____
- 2) There is nowhere for me to rest/nap during my break. _____
- 3) There are not enough bunks available when I arrive. _____
- 4) My supervisors do not disturb me during my rest/nap. _____
- 5) My rest/nap is frequently interrupted with work activities. _____
- 6) I'm not able to take a nap during my workday. _____

Suggestion #7 – Pages#20

Your work schedule

Item (1)(b) add “Extra list” after “...regular schedule”

Item (1) Add new

1) (c) What is your call window?

_____ I am on call 24 Hours

_____ I am on call between _____ and _____

Suggestion #8 – Page 20

Your work schedule

Item (2) Add “including periods of interim release” at the end of the sentence.

Suggestion #9 – Page# 21

Your work schedule

Item (4) delete language, add new, How often per month do you work your day off?

(4)(a) Why?

- a) ___ Voluntarily
- b) ___ Ordered
- c) ___ other _____

Suggestion #10 – Page# 21

Your work schedule

Add new, Item 6, How often do you feel well rested and alert after a nap during your work day?

Never Occasionally Frequently Always

Suggestion #11 – Page 21

Stress at work

Add new stress item for rating

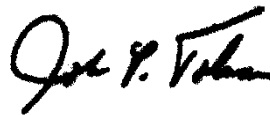
_____ Crew management

Thank you in advance for your attention to these changes.

Sincerely,



James Stem
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John Tolman
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