Department of Transportation

Federal highway administration

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Docket No. fhwa–2020-0001

National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision

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Comments of

The Union Pacific Railroad COMPANY

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The Union Pacific Railroad Company (“UPRR”) submits the attached comments in response to the Federal Highway Administration’s December 14, 2020, notice of proposed amendments to the Manual on Uniform Traffic Control Devices for Streets and Highways (“MUTCD”).[[1]](#footnote-1) UPRR is the principal operating company of Union Pacific Corporation (NYSE: UNP). One of America's most recognized companies, UPRR connects 23 states in the western two-thirds of the country by rail, providing a critical link in the global supply chain. In the period between 2010-2019, UPRR invested approximately $35 billion in its network and operations to support America's transportation infrastructure. The railroad's diversified business mix includes its Bulk, Industrial and Premium business groups. UPRR serves many of the fastest-growing U.S. population centers, operates from all major West Coast and Gulf Coast ports to eastern gateways, connects with Canada's rail systems and is the only railroad serving all six major Mexico gateways. UPRR provides value to its roughly 10,000 customers by delivering products in a safe, reliable, fuel-efficient and environmentally responsible manner. While serving a critical role in North American transportation, UPRR operates over 32,200 route miles that includes over 30,000 highway-rail crossings. In doing so, UPRR considers the safety of not just its rail network, but the intersections of the highway and railway, as being critical to safety and security of its transportation system.

UPRR has a significant interest in this proceeding from the perspective of continuing to improve highway-rail grade crossing safety. In 2020, over 95% of rail-related fatalities were grade crossing users or trespassers.[[2]](#footnote-2) The Federal Railroad Administration has stated that nearly all deaths at rail-highway grade crossings are preventable, indicating that “94 percent of train-vehicle collisions can be attributed to driver behavior or poor judgment.”[[3]](#footnote-3) Trains cannot stop or change direction at grade crossings, so motor vehicles are required by law to yield to trains. Yet, many motor vehicle operators do not obey the law.

UPRR has pursued innovative approaches to highway-rail crossing safety, highlighted by its creation of the Crossing Assessment Program, in an attempt to find new ways to drive crossing incidents “Toward Zero”. UPRR has additionally worked diligently with federal, state, and municipal governmental bodies, as well as SHRP2, NCUTCD, AREMA, and other organizations, to promote uniform and safe transportation solutions. The MUCTD is a critical component in the safe transportation of people and goods on American roadways, and an update is long overdue. UPRR supports an update under Docket No. FHWA-2020-0001, subject to the attached comments. These comments provided by UPRR aim to further the ongoing progression of safety improvements, and UPRR would like to specifically emphasize the following two points: (1) the need for grade crossing diagnostic teams to include railroad representatives, as these representatives have key information, input, and specialized experience not possessed by road authority representatives; and (2) that adjacent intersections, including roundabouts or circular intersections, interconnected traffic signals, and pre-emption, have been shown to have a statistically significant effect on transportation safety; and, while out of railroad control, these elements should be designed with consideration shown to their impact on the nearby highway-rail at grade crossings.

Additionally, UPRR would like to emphasize its comments related to machine vision advancements. Understanding that machine vision must be able to recognize MUTCD compliant signs, markings, and signals, it must be also be able to recognize railroad crossing signals, which operate at a rate of 50hz rather than the 200hz proposed in this revision. Not adequately addressing this issue presents two issues: first, it would require railroads to bear the cost of tens of thousands of site changes, including new power supplies (all for no railroad benefit, and with no mechanism to fund this costly exercise); and second, this would be the only exception to requiring machine vision to recognize and appropriately react to standard traffic control devices.

UPRR appreciates the agency’s consideration of the attached comments.

Respectfully submitted,

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Director of Industry & Public Projects General Counsel

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1. 85 Fed. Reg. 80,898 (Dec. 14, 2020). [↑](#footnote-ref-1)
2. https://safetydata.fra.dot.gov/OfficeofSafety/Default.aspx. [↑](#footnote-ref-2)
3. Federal Railroad Administration, Office of Railroad Policy and Development, Report No. RR-16-10 Analysis of Grade Crossing Accidents Resulting in Injuries and Fatalities May 2016; available online at: https://railroads.dot.gov/sites/fra.dot.gov/files/fra\_net/15767/RR\_GX%20Task%20Force\_Data%20Analysis\_Final.pdf. [↑](#footnote-ref-3)