

EDITORIAL COMMENT

The Signaling Regulations

ARGUMENT as to whether the enactment of the "Signal Inspection Law" was justified in the interest of safety is now beside the point. Rather, the pertinent question deals with methods of complying with the law and the rules, standards, and instructions for the installation, inspection, maintenance, and repair of signaling facilities issued by the Bureau of Safety of the Interstate Commerce Commission and published in the June issue of *Railway Signaling*.

An important provision of the law is that prohibiting the discontinuance or material change of existing signaling installations without permission from the I. C. C. Some roads contend that this is resulting in construction work being delayed until representatives of the Bureau make field inspections and reports before permission is granted to proceed, and that these delays would appear to be unnecessary with respect to changes of minor importance such as moving signals when abandoning or installing a spur track, relocating a passing track switch or when providing temporary signals during line changes, etc. In order to eliminate delays to the railroads as well as to reduce the time required by the inspectors of the Bureau, it would seem that the Commission might well outline types of minor changes which the railroads could handle without permission from the Commission, but with the understanding that the Bureau would be notified and that the changes might later be subject to inspection by the Bureau.

Conformity With New Standards

The changes necessary to bring existing signaling into conformity with certain of the new standards, within a period of two years, should be thoroughly investigated at once, because two years is a relatively short time. Where the railroads are faced with expensive changes throughout extended territories, such matters should be thoroughly analyzed at once and discussed in detail with the Bureau. Recent experience indicates that railroads having adequate reasons for requesting extensions of time will be given favorable hearings, providing proper diligence is shown in getting the work started.

The tests and inspections required by the new regulations are not as stringent as was feared; however, on the vast majority of the roads, considerable thought must be given to the planning of schedules of inspections and tests, organizing the field forces and providing proper instruments.

Accuracy and efficiency in making tests in a uniform manner over an entire railroad will necessitate that all

instruments and testing apparatus be similar and of high-grade construction. Therefore, an inventory should be made of the instruments on hand, and a program inaugurated to purchase types of instruments and testing sets which may be adopted as standard. Master instruments of the laboratory type should be available to calibrate the field instruments at frequent intervals so that all testing over the entire railroad will be of a uniform character, year after year.

Some roads have decided to reproduce in standard rule-book form the regulations issued by the Commission, and to add thereto supplementary directions concerning methods of testing certain types of equipment which may be standard on the particular road. Other railroads may decide that many of the items of the regulations should be rewritten to apply specifically to the types of equipment in their service. In view of the fact that these rules are effective as of September 1, it would seem that the method first explained might well be given a thorough test, to be followed later, if necessary, by a complete reorganization of the rules as may be required to meet the needs of an individual railroad.

Reduce the Book Work

An important requirement is that a record must be made of the tests, and this calls for serious thought to devise methods which will reduce the book work required to a minimum. Some roads are of the opinion that, for certain types of tests, a log-book record would not only require minimum time and effort but also would be in a permanent form readily available. On the other hand, the data taken when making certain tests can be arranged more conveniently in columns on a printed form, thus reducing the amount of writing. By providing spaces to record several tests of a particular device, the same form sheet could be used for several years, one advantage being a quick means of detecting any change in the operating characteristics. Perhaps the use of a loose-leaf binder to hold these sheets would facilitate work in the field and also constitute a permanent file record without the need for file cases and a complicated filing system.

Whether compliance with the law and the regulations will be effective in increasing the safety of railroad operation can be determined only by comparing the items with reference to safety in the annual signal performance records. In order to accumulate data on which to judge the economic justification, the railroads should keep accurate records of expenses incurred in complying with the law and the regulations.