



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

# Memorandum

Date: February 3, 2004

Reply to Attn of: OP-04-22

Subject: 49 CFR Part 220, Railroad Communications - Section 220.27(c), Short Identification

Original Signed By:

From: Edward W. Pritchard

Director, Office of Safety Assurance and Compliance

To: Regional Administrators

In July 1994, the Federal Railroad Administration (FRA) published the *Report to Congress on Railroad Communications and Train Control*. In the report, FRA found that radio related problems concerning the human interface element included significant problems with failure to identify stations properly. In reference to 49 CFR Section 220.27, *Identification*, specifically Section 220.27(c), *short identification* (short ID), occasionally the question arises regarding what FRA considers to be acceptable in this regard. The regulation allows that the short ID may be used solely in connection with switching, classification, and similar operations wholly within a yard, but only after positive identification is first achieved (i.e, the "full" ID must be transmitted and acknowledged initially). Further, the short identification must be consistent with applicable Federal Communications Commission (FCC) regulations governing "Station Identification." Concerning whether an engine number alone may be used as a short ID, such as "3263" vs. "UP 3263," the following is issued as the official agency policy on short identification.

It has consistently been FRA's position that there always be a **unique** designation or identifier during radio transmissions. In certain situations, using only the engine number would be acceptable, such as in a small yard where, for example, only BNSF engines were working. However, in larger yards, such as Argentine, Barstow, North Platte, etc. with run-through power, the large number of locomotive leasing companies around today, and the possibility of other similar mobile unit designations, the engine number alone may not always be **unique**, because there could be duplicate mobile unit (engine) numbers, e.g., UP 3263, LMX 3263, BNSF 3263, CR 3263, UTLX 3263, Ballast Regulator 3263, etc. In the identification of mobile units in these situations, we have maintained that the alpha characters should be used along with the engine number to make it **unique**.

Referring to the FCC regulation on station identification, which is found at 47 CFR Section 90.425(a)(4), it states: "In the Industrial/Business Pool, railroad

licensees . . . may identify stations by the name of the railroad and the train number, caboose number, engine number, or the name of the fixed wayside station. If none of these forms are practicable, any similar name or number may be designated by the railroad concerned for use by its employees in the identification of fixed points or mobile units; . . . “ The regulation further states: “In the Industrial/Business Pool, licensees may request . . . the use of special mobile unit identifiers in lieu of the assigned call sign. Such requests, however, will not be granted . . . where it appears that the proposed method of identification will not adequately distinguish the mobile units of the applicant from the mobile units of other licensees in the area.”

While FRA prefers that alpha characters always be used along with the engine number, it cannot legally hold railroads to that standard in all situations. Notwithstanding, it must be borne in mind that in accordance with the aforementioned FCC regulation and 49 CFR Section 220.27, the unit identifier must still be **unique**. We continue to strongly recommend, in the interests of safety, that it is better in all cases to use the alpha characters preceding the engine number because in many situations there is a likelihood of duplicity of numbers.

Based on the foregoing, it is permissible to use the engine number alone only if it is a **unique** identifier which indicates to the listener the precise mobile transmitting station. The responsibility for the **uniqueness** of the identifier of mobile units rests solely with the railroads, i.e., they must ensure that no duplicate mobile unit (engine) numbers exist prior to using the engine number alone during radio transmissions in connection with yard switching operations. Naturally, the above applies only during yard switching operations, and FRA expects the full identification to be used in all other situations.

If inspectors encounter situations where duplicate mobile unit (engine) numbers exist in a particular yard switching operation, and the railroad is not using the alpha characters to distinguish them from each other during radio transmissions, then the railroad will be subject to the assessment of a civil penalty. Further, if systemic problems develop in this area, FRA may consider taking other appropriate enforcement actions.

The Office of Chief Counsel has provided a supporting legal analysis for this Technical Bulletin. If there are any questions concerning this Technical Bulletin, please contact Mr. Dennis Yachechak, Operating Practices Specialist, at (202) 493-6260.

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