

turning off equipment. Failure of a component during the test phase will not jeopardize the safety of train operations. With or without Train Sentinel equipment operating on-board the controlling locomotive, the train remains subject to the provisions of the rules governing the existing method of operation.

Section 236.15 Timetable Instructions

Waiver is requested exempting the Train Sentinel pilot territory from the timetable designation requirement of this section.

Justification: Since the pilot program will consist of tests and demonstrations, identifying the test territory in the timetable as "Train Sentinel" (or some similar label) would be both premature and an unnecessary paperwork burden.

Section 236.23 Aspects and Indications

Waiver is requested to the extent that the Train Sentinel display on-board an equipped locomotive shall not be construed to represent or correspond to signal aspects or indications subject to the requirements of this section.

Justification: The Train Sentinel design excludes any visual display of signal aspects or indications. Train Sentinel enforceable authorities which may or may not derive from signal indications are on-board. Text authorities such as name of signal or track bulletins are displayed to the train crew. Information on the Train Sentinel display will correspond with authority conveyed through wayside signals.

Section 236.76 Tagging of Wires and Interference of Wires or Tags With Signal Apparatus

Waiver is requested exempting Train Sentinel equipment from the wire-tagging requirement.

Justification: Train Sentinel hardware consists of computers, computer peripherals, and communication devices. While the inapplicability of this section to circuit boards, connectors, and cables would appear obvious, waiver is sought for clarification.

Section 236.101 Purpose of Inspection and Tests; Removal From Service of Relay or Device Failing To Meet Test Requirements

Waiver is requested exempting Train Sentinel equipment from the requirement for removal of failed equipment from service.

Justification: Train Sentinel requires flexibility in installing, removing, turning on, and turning off the equipment. With or without Train

Sentinel equipment operating on-board, a train remains subject to the provisions of the rules governing the existing methods of operation.

Section 236.107 Ground Tests

Waiver is requested exempting Train Sentinel equipment from the requirement for ground testing during the test phase.

Justification: Train Sentinel hardware consists of computers, computer peripherals, and communication devices. Ground tests would serve no purpose in ensuring safety and could be damaging to the equipment.

Section 236.109 Time Releases, Timing Relays and Timing Devices

Waiver is requested exempting Train Sentinel equipment from the testing requirement of this section during the test phase.

Justification: The timing devices in Train Sentinel equipment are software-driven, have no moving parts, and are far more reliable than the devices for which this regulation was promulgated to address.

Section 236.110 Results of Tests

Waiver is requested exempting Train Sentinel tests from the record keeping requirements of this section.

Justification: The Train Sentinel pilot is a test program during which the types of tests needed to ensure appropriate levels of maintenance will be defined.

Section 236.501 Forestalling Device and Speed Control

Waiver is requested exempting Train Sentinel from the requirement for medium-speed restriction.

Justification: Train Sentinel will not be connected to a signal system, but will receive input from the signal system and operate to perform its intended function in the event of failure of the engineer to obey a restrictive condition displayed in the cab. Train Sentinel will enforce speed restrictions reflected in the track database or issued through the dispatcher system.

Section 236.504 Operation Interconnected With Automatic Block-Signal System

Waiver is requested exempting Train Sentinel from the requirement of interconnection with an automatic block-signal system.

Justification: The Train Sentinel system will have no connection to the signal system; however Train Sentinel will receive input from the signal system and operate to perform its intended function in the event of failure of the engineer to obey a restrictive condition displayed in the cab.

Section 236.511 Cab Signals Controlled in Accordance With Block Conditions Stopping Distance in Advance

Waiver is requested exempting the Train Sentinel onboard display from the cab-signal requirements in this section.

Justification: Train Sentinel is not an automatic cab signal system and will have no connection to a signal system but will receive input from the signal system and display the signal name that forms the basis for limits of authority that will be depicted on the display.

Section 236.514 Interconnection of Cab Signal System With Roadway Signal System

Waiver is requested exempting Train Sentinel from the requirement of interconnection with a roadway signal system.

Justification: The Train Sentinel system is not a cab signal system and will have no connection with the signal system. However, Train Sentinel will receive input from the signal system and display the signal name that forms the basis for limits of authority.

Section 236.515 Visibility of Cab Signals

Waiver is requested exempting the Train Sentinel display from the visibility requirement of this section during the test phase.

Justification: Train Sentinel is not a cab signal system. However, Train Sentinel receives input from the signal system and displays the signal name governing the movement. The visibility requirements of this rule will be met in the Train Sentinel production system.

Section 236.534 Entrance to Equipped Territory; Requirements

Waiver is requested exempting Train Sentinel from the requirements of this section during the test phase.

Justification: Train Sentinel tests require flexibility in installing, removing, turning on, and turning off Train Sentinel equipment.

Section 236.552 Insulation Resistance; Requirement

Waiver is requested exempting Train Sentinel equipment from the insulation resistance requirement of this section.

Justification: Train Sentinel equipment consists of computers, computer peripherals, and communications equipment. Insulation resistance tests could be damaging to such components.