

system with regard to speed. In the event of a failure of the engineer to obey any restrictive speed CAS will enforce a stop.

#### Section 236.511

Cab signals controlled in accordance with block conditions stopping distance in advance. Waiver is requested exempting the CAS on-board display from the cab-signal requirements of this section.

*Justification:* CAS is not an automatic cab signal system and will have no connection to a signal system. CAS will receive data radio 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 236.515

Visibility of cab signals. Waiver is requested exempting the CAS display from the visibility requirement of this section during the test phase.

*Justification:* The visibility requirements of this rule will be met in the CAS production system.

#### Section 236.534

Entrance to equipped territory; requirements. Waiver is requested exempting CAS from the requirements of this section during the test phase.

*Justification:* CAS tests require flexibility in installing, removing, turning on, and turning off CAS equipment.

#### Section 236.552

Insulation resistance; requirement. Waiver is requested exempting CAS equipment from the insulation resistance requirement of this section.

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

#### Section 236.553

Seal, where required. Waiver is requested exempting CAS from the seal requirement of this section.

*Justification:* The CAS will allow for manual disablement of on-board CAS functions and equipment through an on-board manual function. Use of the on-board cutout function will be electronically monitored and reported to the dispatcher as an alarm. The CAS tests require flexibility in installing, removing, turning on, and turning off CAS equipment.

#### Section 236.566

Locomotive of each train operating in train stop, train control or cab signal territory; equipped. Waiver is requested

to the extent that the equipped requirements in the section shall not apply to CAS during the test phase.

*Justification:* A small subset of locomotives operating in the test territory will be CAS equipped; the majority of trains will not be equipped. CAS tests require flexibility in installing, removing, turning on and turning off the on-board equipment. In any case, all CAS tests will be conducted under the provisions of the rules governing the existing methods of operation.

#### Section 236.567

Restrictions imposed when device fails and/or is cut out enroute. Waiver is requested exempting CAS tests from the restrictions associated with device failure or cutout.

*Justification:* CAS tests require flexibility in installing, removing, turning on and turning off the on-board equipment. All CAS tests will be conducted under the provisions of the rules governing the existing methods of operation. A failure or deactivation of the CAS equipment will not jeopardize safety of train operations.

#### Section 236.586

Daily or after trip test. Waiver is requested exempting CAS from the requirements of this section during the test phase.

*Justification:* During the CAS test phase, the requirements for a daily or after trip test, if necessary, will be defined. An objective is to perform this test without human intervention.

#### Section 236.587

Departure test. Waiver is requested exempting CAS from the requirements of this section during the test phase.

*Justification:* During the CAS test phase, the requirements for a departure test will be defined. An objective is to perform this test without human intervention.

#### Section 236.588

Periodic test. Waiver is requested exempting CAS from the requirements of this section during the test phase.

*Justification:* During the CAS test phase, the requirements for a departure test will be defined.

#### Section 240.127

Criteria for examining skill performance. Waiver is requested exempting CAS from the testing requirements of this section during the test phase.

*Justification:* Criteria and procedures for CAS performance evaluation do not yet exist; they will be identified and defined during the CAS test phase.

#### Section 240.129

Criteria for monitoring operational performance of certified engineers. Waiver is requested exempting CAS from the performance monitoring procedures during the test phase.

*Justification:* Criteria and procedures for CAS performance evaluation do not yet exist; they will be identified and defined during the test phase.

It is acknowledged for clarification that CAS, when fully operative during the test phase, will comply with the following regulations:

#### Section 236.8

Operating characteristics of electromagnetic, electronic, or electrical apparatus. CAS computing equipment will comply with this regulation.

#### Section 236.501

Forestalling device and speed control. CAS is designed to enforce maximum authorized speeds, speed restrictions, slow speed, and absolute stop. CAS will comply with § 236.501 except for paragraph (b)(2).

#### Section 236.502

Automatic brake application, initiation by restrictive block conditions stopping distance in advance. CAS is designed to initiate an automatic brake application stopping distance in advance of the end of limits of authority; or the beginning of each speed restriction in the route.

#### Section 236.503

Automatic brake application; initiation when predetermined rate of speed exceeded. CAS will comply with this regulation.

#### Section 236.505

Proper operative relation between parts along roadway and parts on locomotive. CAS will function as intended under all conditions of speed, weather, oscillation, and shock. CAS will comply with this regulation.

#### Section 236.506

Release of brakes after automatic application. After a CAS initiated brake application, brakes cannot be released until the train is stopped.

#### Section 236.507

Brake application; full service. CAS will comply with this regulation.

#### Section 236.508

Interference with application of brakes by means of brake valve. CAS equipment will not interfere with or impair the efficiency of the automatic or independent brake valves.