



U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

NOV 04 2016

(b) (6)

Senior Vice President—Engineering, Mechanical, and Purchasing
Florida East Coast Railway
7150 Phillips Highway
Jacksonville, FL 32256

Dear (b) (6):

This reply is in response to Florida East Coast Railway's (FEC) July 16, 2016, email to the Federal Railroad Administration (FRA) requesting that FRA modify a letter of concurrence. FEC has been performing pilot program tests to evaluate the feasibility of and safety issues related to using liquefied natural gas (LNG) as a locomotive fuel. The current practice is to have a General Electric (GE) representative onboard each LNG consist train operating between Bowden and Hialeah, FL.

FEC requested FRA's concurrence to operate revenue service trains with an LNG tender and dual fuel locomotive as part of a series of pilot test operations. FEC indicated in its letter dated December 16, 2015, requesting a Phase 2 concurrence and its letter dated March 31, 2016, requesting a Phase 3 concurrence that FEC would have an LNG engineering representative from the locomotive manufacturer (GE) onboard the LNG consist at all times. This was to ensure that train crews gained experience with the equipment and a seamless operation of the dual fuel locomotives. FRA issued concurrence letters for Phases 2 and 3 on May 4, 2016, and June 3, 2016, respectively. Currently, FEC is conducting Phase 3 tests.

FRA acknowledges FEC's justification to discontinue the practice of a GE representative riding in each LNG consist because FEC crews have gained significant experience with over 70 LNG-fueled train movements over its rail network. Both FEC and GE feel the crews are appropriately knowledgeable, supportive, and comfortable with the seamless operation of the LNG consist. However, FEC may request the participation of a GE representative in the LNG consist if there is a benefit.

After a careful review of FEC's request by technical staff, FRA determined that having a GE representative in each of the LNG consist train is not necessary. The absence of a GE representative does not adversely impact the safety of operating an LNG consist train. FRA concurs with FEC in suspending the practice of having a GE representative in each of the LNG consists. Furthermore, FRA also concurs with FEC that if a situation arises when the