



The Docket Clerk
Office of Chief Counsel
Federal Railroad Administration
1200 New Jersey Avenue, S.E.
Mail Stop 10
Washington, D.C. 20590

Re: Support for Petition for Waiver by the City of Commerce City, CO and Railroad Controls LP

Dear Sir/Madam:

The City of Richmond, CA supports the Petition for Waiver by the City of Commerce City, CO and Railroad Controls, LP. The City of Richmond has recently installed a wayside horn at the 34th Street crossing on the Richmond Pacific Railroad. The City of Richmond welcomes the community benefit of the wayside horn and desires to implement the system as soon as possible, however, we have been informed of a recent interpretation by the Federal Railroad Administration regarding the requirements of the Wayside Horns indicating that the Wayside Horn shall continue sounding until the lead locomotive reaches the far side of the crossing.

The waiver petition provided by the City of Commerce City, CO and Railroad Controls, LP states that there are limitations with the constant warning time circuitry which makes complying with this interpretation problematic. We believe the supporting information contained within the waiver petition, the proposed solution and the safety analysis all support an appropriate resolution to this issue. It further addresses this issue with respect to all existing and future wayside horn systems. If the Federal Railroad Administration does not accept this waiver it may put an undue financial burden on communities wishing to implement this solution.

Therefore, the City of Richmond, CA wishes to provide its support of the waiver petition and seeks the Federal Railroad Administration acceptance of the waiver petition as filed.

Feel free to contact me if you have any questions.


Joel C. Camacho PE
Associate Civil Engineer
7/11/2013

Respectfully submitted,