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U.S. Department of Transportation
Research and Special Programs Administration

The Administrator

400 Seventh Street, S.W.
Washington, D.C. 20590

SEP 7 1999

The Honorable Jim Hall
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

Dear Chairman Hall:

This is in response to National Transportation Safety Board (NTSB) Safety Recommendation P-99-12. This recommendation addresses fatigue issues for pipeline dispatchers and operators and the possible need for hours-of-service regulations in the pipeline industry.

P-99-12 **Establish within 2 years scientifically based hours-of-service regulations that set limits on hours of service, provide predictable work and rest schedules, and consider circadian rhythms and human sleep and rest requirements.**

In a letter of June 1, 1999, NTSB recommended several ways to address the issue of operator fatigue in the pipeline industry. Similar recommendations were issued to the Federal Aviation Administration, Federal Highway Administration, Federal Railroad Administration, and the U.S. Coast Guard.

On May 4, 1999, RSPA responded to NTSB Safety Recommendation P-98-30, which called for RSPA to assess the risks associated with pipeline controller shifts, and to establish industry guidelines to reduce the likelihood of accidents attributable to controller fatigue. In that letter we indicated that we are communicating with the pipeline community to reinvigorate consideration of human factors and fatigue in the pipeline industry. Working with the pipeline industry, we will continue to evaluate how rotating controller schedules in the pipeline industry may be related to human fatigue and safety outcomes and will be better able to address fatigue issues in the pipeline industry.

RSPA recently notified NTSB of our other efforts to investigate the issue of fatigue in pipeline transportation. RSPA joined the DOT Safety Council task force that is studying hours-of-service issues in motor carrier operations. The lessons of this work may be useful as we examine controller fatigue issues in the pipeline industry and assess the need for regulatory action. We have also assigned additional personnel to DOT's Human Factors Coordinating Council to ensure access to the thinking of all parts of the Department on human factors and hours-of-service issues.

As indicated in RSPA's response to Recommendation P-98-30, following our assessment of human fatigue in pipeline operations and the results of the research and standards efforts now underway, we will evaluate the need for further development and application of guidelines to reduce the threat of pipeline incidents attributable to operator fatigue. RSPA believes the current efforts now in progress will provide the necessary information for an assessment of the need for hours-of-service requirements in the pipeline industry. RSPA will provide the NTSB staff with an update on our progress at the regular semiannual meeting scheduled for October 1, 1999.

Pending completion of the current efforts described above and the resulting assessment of the findings, we request that Safety Recommendation P-99-12 be classified as "OPEN--Acceptable Response".

If we can be of further assistance, please contact me or Jack Murray, Director, Office of Policy and Program Support at (202) 366-4831.

Sincerely,

Kelley S. Coyner

cc: Robert Chipkevich, NTSB
Rod Dyck, NTSB