

Union Pacific Railroad
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Comments of Union Pacific Railroad Company regarding the second set of proposed Rules and Regulations to Title 291, Chapter 3, Motor Carrier Rules and Regulations. Rule and Regulation #182 Motor Carriers.

Union Pacific requires its contract carriers who transport train crews to comply with all pertinent laws related to the services they provide. The proposed rule change is consistent with Union Pacific's contractual requirements related to vehicle and passenger safety. In addition, Union Pacific's contract carriers indemnify Union Pacific for injury or death to railroad employees regardless of who's at fault in an accident. The contracts with Union Pacific also require the carriers to maintain commercial general liability insurance coverage in the amount of \$5M for each occurrence and \$10M aggregate. Accordingly, Rule 006.02A, a proposal to include higher uninsured/underinsured insurance coverage for carriers providing transportation of railroad train crews would only serve to add additional financial burden to the contract carriers, and would not provide any additional protection for injuries incurred involving contract carriers.

Sincerely,

Kelli E. O'Brien

