INTERSTATE COMMERCE COMMISSION

REPORT OF THE CHIEF OF THE BUREAU OF SAFETY IN RE INVES-TIGATION OF AN ACCIDENT WHICH OCCURRED ON THE PHILADEL-PHIA & READING RAILWAY NEAR WOODMONT, PA, ON DECEMBER 5, 1921

December 23, 1921

To the Commission

On December 5, 1921, there was a head-end collision between two passenger trains on the Philadelphia & Reading Railway near Woodmont, Pa, which resulted in the death of 20 passengers, 2 employees on duty, and 5 employees off duty, and injury to 65 passengers and 5 employees. This accident was investigated in conjunction with representatives of the Public Service Commission of the Commonwealth of Pennsylvania

LOCATION AND METHOD OF OPERATION

This accident occurred on the Newton Branch of the New York This branch leads off from the double track of the New York Short Line Branch at Cheltenham, Pa, and is single track from Cheltenham to Newtown, Pa, a distance of 166 miles ment of trains is governed by time-table and train orders, eastbound trains being superior by direction. In addition there is a block system, part of which is automatic and part manual, from Cheltenham eastward to Bryn Athyn, a distance of 54 miles, the automatic block system is used, the signals being of the inclosed-disk type, while from Bryn Athyn to Newton, the end of the line, a manual block sig-There are two telegraph block sections, one nal system is in use from Bryn Athyn to Churchville, a distance of 57 miles, while the other is from Churchville to Newtown, a distance of 55 miles tween Bryn Athyn and Churchville there is an intermediate nonblock station, Southampton, where trains frequently meet

The first station west of Bryn Athyn is Huntingdon Valley, 0.7 mile distant. At this station there are two automatic block signals, 713 for eastbound trains and 713-A for westbound trains Bryn Athyn station is located on the south side of the track, the telegraph office being in the station. Seventy-three feet east of the telegraph

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office, and also located on the south side of the track, is a telegraph block signal This signal is a two-position semaphore signal of the upper-quadrant type, having one aim, it governs castbound trains only, a flag being used when there are train orders for westbound About 515 feet east of this signal is the point of a switch which leads to a spur track extending westward paralleling the main track on the south and ending near the telegraph block signal, this track was used as a passing siding. One hundred and seventy feet east of the point of the switch is located automatic block signal 716, which is the first of the automatic block signals governing westbound trains The track circuit controlling signal 713 begins at a point about 1,500 feet east of signal 716 Between the point of the switch and signal 716, the track passes over a steel bridge about 50 feet in length, spanning a small stream Beginning at Bryn Athyn station and proceeding eastward, there is a 4-degree curve to the left which extends to the point of the switch From the point of the switch eastward the line is tangent for a considerable distance Trees located on the north side of the right of way obstruct the view of signal 716 from Bivn Athyn station

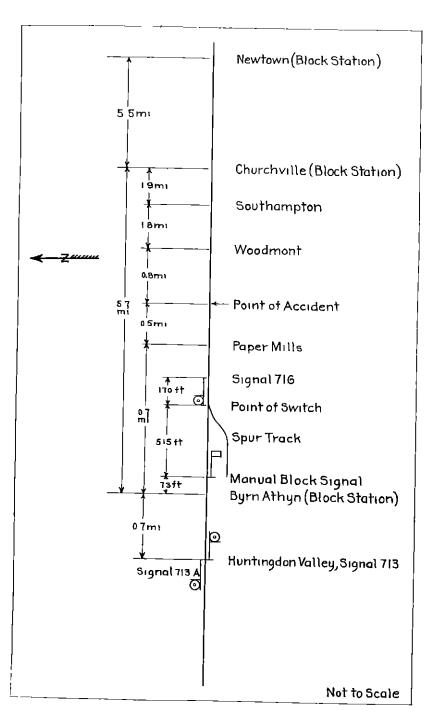
The point of collision was about 13 miles east of Bryn Athyn, and 08 mile west of Woodmont, it occurred in the middle of a rock cut about 200 feet in length and having a maximum depth of 30 feet. The cut is located on a compound curve to the south about 1,000 feet in length, having a maximum curvature of 7 degrees. On account of this curve and cut, the range of vision was much restricted, and there was little opportunity for either engineman to see the opposing train. The weather was clear at the time of the accident, which occurred at about 7.55 a.m.

DESCRIPTION

Westbound passenger and milk train No 154, en route from Newtown to Philadelphia, was in charge of Conductor Stout and Engineman F Rook, and consisted of engine 265 and 5 cars. It left Newtown at 6 50 a.m., arrived at Churchville at 7 06 a.m., departed at 7 12 a.m., 5 minutes late, and arrived at signal 716 at 7 28 a.m. The train was brought to a stop at signal 716, because it did not have sufficient time to make Huntingdon Valley, its time-table meeting point, for superior train No 151, also because signal 716 was in the stop position. A flagman was sent ahead and after a few minutes, the train following him, pulled down to Bryn Athyn station and unloaded passengers. While at the station the crew received form 19 train order No 9, reading as follows.

Dislegald signal 716 and run carefully Complete 731 a m

After discharging passengers and receiving the train order a flagman was sent back, and train No 154 backed up to a point about



100 feet east of signal 716 in order that train No 151, upon arrival, might pull up and back into the spur track to meet train No 154, the track not being long enough to hold the latter train. After train No 151 had arrived and backed in on the spur track, train No 154 proceeded and passed Bryn Athyn station without stopping, according to Operator Clayton's block record, at 746 a m, the dispatcher's train sheet, however, showed the train departing at 744 a m, this time having been changed from 754 a m

Westbound passenger train No 156, en route from Newtown to Philadelphia, in charge of Conductor Smath and Engineman J Rook, was made up in the following order Engine 278, coaches 833, 925, 1026, and 970, and combination coach and baggage car 490, all of wooden construction. The train left Newtown at 730 a m and at 741 a in arrived at Churchville, where the manual block signal was in the stop position. The conductor went to the telegraph office and received form 31 train order No 11, reading as follows.

No 151 will meet No 156 at Blyn Athyn No 151 take siding. Complete 7 44 a $\,\mathrm{m}$

The conductor delivered a copy of the order to the engineman, who read it, the block signal was cleared and the train departed, as shown by the records, at 7 45 a m. It passed Woodmont and while running at a speed estimated to have been between 30 and 35 miles an hour it collided with eastbound train No. 151

Eastbound passenger train No 151, en route from Philadelphia to Newtown, was in charge of Conductor Evans and Engineman It was hauled by engine 167 and consisted of combination baggage and passenger car 489, of wooden construction, and coaches 1093 and 1071, of steel-underframe construction It left Philadelphia at 648 a m, and passed Fox Chase, 33 miles west of Huntingdon Valley, at 720 a m, on time At Huntingdon Valley, a nontelegraph station and its time-table meeting point with train No 154, it found automatic block signal 713 in the stop position. A flagman was sent ahead and after waiting a few minutes the train followed him to Bryn Athyn, arriving, the train sheet record shows, at Upon arrival at Bryn Athyn the telegraph block signal was found in stop position, while train No 154 was standing on the main track east of signal 716 Conductor Evans sent word to his engineman to pull up and back in on the siding, but the engineman insisted that they get an order to do so Conductor Evans went to the telegraph office and received form 31 train order No 11, reading as follows

No 151 will meet No 156 at Bryn Athyn. No 151 take siding. Complete $7.46~\mathrm{a}$ m

After receiving the train order, Conductor Evans returned to his train and delivered a copy of the order to the engineman, while the

operator came out on the platform and assisted in handling baggage, the train then pulled ahead under flag protection and backed in on the siding. When the switch was closed, train No. 154 departed, then the switch was again opened and train No. 151 pulled out, departing, as shown by the records, at 7.46 a.m. A stop was made at Paper Mills station, 0.7 mile east of Bryn Athyn, to let off some trackmen, after which the train proceeded and had gone about 0.5 mile when, while running at a speed estimated to have been 25 or 30 miles an hour, it collided with train No. 156

The impact forced both engines upwaid, engine 167, of train No 151, coming to lest bottom up, headed west and on top of its own tender, while engine 278, of train No 156, was on top of engine 167 The combination car of train No 151 was partially telescoped by the tender of engine 167 The forward end of the second car of train No 151 was also partially telescoped by the near of the combination car. while the rear car remained on the rails and was only slightly damaged The first coach of train No 156 was completely telescoped by the tender of engine 278 The next car was partially telescoped at its forward end by the wieckage, while the real truck remained on the rails The third, fourth, and fifth cars of train No 156 were practically undamaged by the collision The wreckage took fire immediately, the first car of each train being completely destroyed The fire spread quickly and destroyed the superstructures of the second and third coaches of train No 156 and of the second coach of train No 151 It is probable that many of the deaths were the result of the fire that followed the collision The employees on duty killed were the firemen of each train

SUMMARY OF EVIDENCE

Conductor Evans, of train No 151, stated that upon animal at Bryn Athyn he went to the telegraph office and signed and received train order No 11. He read it in a low tone of voice and was under the impression that it was an order to meet train No 154 at Bryn Athyn. After receiving the order he walked to the engine and delivered a copy of it to the engineman, neither of them reading it to the other or making any comment whatever. His train then pulled down and backed in on the siding, after train No 154 had departed the switch was opened, the train pulled out of the siding and proceeded without a clearance card or other permission from the operator at Bryn Athyn, although the block signal was in the stop position. He stated it was his understanding that a train order was sufficient authority for a train to pass a block or train-order signal in the stop position without a clearance card. He did not show his copy of the train order to his trainmen, as they were both attending to the

switches at the time, but he put it under the baggagemaster's box in the baggage car, as was his custom, so that the baggagemaster might see it

Engineman Yeakel stated that when Conductor Evans handed him the order he glanced at it and got the impression that it was an order to meet train No 154 at Bryn Athyn—He held the order in his hand until his train was in on the siding, later he put it into his pocket. He saw the opposing train just as the collision occurred, but did not have time to apply the brakes

The statements made by Operator Clayton, on duty at Bryn Athyn, are conflicting and vacillating. He stated that when train No 151 arrived at Bryn Athyn the conductor came into the telegraph office and signed train order No 11 He transmitted the signature to the train dispatcher, received "complete" from him at 746 a m, and delivered the order to Conductor Evans, who read it to himself, Operator Clayton said he overheard him read it and said he read it correctly Following this, Operator Clayton went out on the platform and assisted in unloading baggage from train No Operator Clayton's first statement was to the effect that he did not report train No 154 clear of the block to Churchville and that the operator at Churchville did not secure his permission to let train No 156 enter the block He also stated it was his understanding that the block was between Bryn Athyn and Churchville Upon subsequent examination, however, Operator Clayton stated that he cleared the block to Churchville as soon as the rear of train No 154 had crossed the bridge just west of signal 716 and that he gave the operator at Churchville permission to let train No 156 proceed on a clear block, considering that the block for westbound trains ended at automatic signal 716 After train No 154 had departed, he went out on the station platform to bring in a flag which he had used for a train-order signal, and it was at that time he discovered train No 151 pulling out of the siding He made an effort to signal the train to stop but was unsuccessful Operator Clayton stated that had he waited until the rear of train No 154 had actually passed his station before clearing the block to Churchville, he would probably have discovered that train No 151 had departed contrary to their orders, and would then have refused to give the block to the operator at Churchville for train No 156 to proceed and thus would have The block record at Bryn Athyn clearly prevented the accident indicates that the entries relative to trains Nos 151 and 154 had Operator Clayton was unable to explain these alterations except on the ground that he was busy selling tickets at the time and that the entries were not made at the time of the occurrence but from memory about an hour afterwards, at which time he was very much excited and disturbed

Operator Tomlinson, on duty at Churchville, also made statements on two occasions which are conflicting In his first statement Operator Tomlinson said he permitted train No 156 to proceed from his station, giving them a clear block signal, and at that time train No 154 had not been actually cleared of the block by the operator at Bryn Athyn, but that he had an understanding with the operator at Bryn Athyn that train No 154 stood at Bryn Athyn station ready On the second occasion, Operator Tomlinson stated that upon the arrival of train No 156 the conductor came to the office and signed train order No 11, and that he transmitted the signature to the train dispatcher and received "complete" from him at 744 a m He immediately communicated with the operator at Bivn Athyn and ascertained that train No 154 was clear of the block at Bivn Athyn. the conductor of train No 156 left the telegraph office, went to the engine and delivered a copy of the order to the engineman, while thus engaged, Operator Tomlinson cleared the train-order signal and the train departed immediately

At the investigation Operator Tomlinson produced a record which he identified as the original block record kept at his station record showed that train No 154 cleared the block at Bryn Athyn at 745 a m, the figure "5," however, bore indications of alteration and, upon questioning, Operator Tomlinson admitted that he had changed the clearing time from 746 a m to 745 a m for the purpose of making the record 745 a m on The block record produced by Operator Tomlinson was contained in a new record book, the first entry being for Operator Tomlinson was later required to produce the book containing the record previous to December 1, and upon examination of that record it was apparent that several pages of the book subsequent to November 30 had been removed record book only three columns were filled in, the train number, and the alliving and departing time of trains, while in the new book the columns headed "Train No," "Signals displayed," "Entered block in rear," "Arrived," "Entered block," "Reported to block station in advance." "Clear block reported to station in rear," and "Advance block reported clear," were all filled in Upon further examination, Operator Tomlinson admitted that the book which he had identified during his previous examination as the original record was not the original, but a copy which he made for the purpose of this investigation, and that the copy contained additional information not shown by the original record and that the original record had been destroved by him He assumed full responsibility for making these changes and for destroying the original record, stating that he acted entirely upon his own initiative and without suggestion or instruction from any person Operator Tomlinson stated that his office

was closed when standard time was transmitted by telegraph and as a result he seldom received standard time, he did occasionally compare his watch with trainmen who had standard time. He was unable to say whether his watch was correct on the day of the accident

Conductor Stout, of train No 154, stated that his train passed Bryn Athyn station at about 748 a m. He also stated it was his understanding that the block for westbound trains ended at Bryn Athyn station. However, upon cross-examination by General Superintendent Fisher, he retracted this statement and said the block ended at signal 716. Engineman F. Rook, of train No 154, stated it was his understanding that the rear of a westbound train would have to pass Bryn Athyn station before the block could properly be cleared to Churchyille.

Engineman J Rook, of train No 156, stated that the block signal at Churchville was cleared as the conductor was walking down the platform with the train order. He did not recall the time his train left Churchville, but said it passed Southampton 3 minutes late. This would make train No 156 passing Southampton at 749 a.m., the schedule time from Churchville to Southampton is 5 minutes which would make train No 156 departing from Churchville at 744 a.m. Engineman Rook also stated that when he receives a clear block signal at Churchville he understands that the block is clear to Bryn Athyn station and not to signal 716 only. He stated that he saw the engine of train No 151 when it was about 40 feet distant and that he made an application of the brakes just before the collision occurred.

Brakeman Fulmore, of train No 156, stated that when his train was leaving Churchville he looked at his watch and it was then between 745 a m and 746 a m

Train Dispatcher Rich stated that when train No 154 arrived at Bryn Athyn the conductor reported signal 716 in the stop position At that time one of his telegraph wires was in trouble east of New York Branch Crossing, and from this he concluded that the entire signal cricuit from signal 716 to Huntingdon Valley was out of order, and to avoid delay to train No 156 which would result from train No 154 being required to flag to Huntingdon Valley, he issued train order No 9, for train No 154 to disregard signal 716 He admitted, however, that this signal condition might arise with train No 151 occupying the track circuit between signals 713 and 716, also if train No 154 entered the track circuit east of signal 716 and was unable to proceed farther than Bryn Athyn on account of time-table inferiority, it would be necessary for train No 151 to flag from Huntingdon Valley to Bryn Athyn

Signal Supervisor Steele stated that on the morning of December 5, signal 716 was reported as being out of order, but inspection by the signal maintainer disclosed no trouble and that the signal was working properly

CONCLUSIONS

This accident was caused by the failure of Conductor Evans and Engineman Yeakel, of train No 151, to obey train order No 11, directing them to meet train No 156 at Bryn Athyn, also by their failure to observe manual block-signal rules in leaving Bryn Athyn with the block signal in the stop position without securing a clearance card—Contributing to this was the failure of the operator at either Bryn Athyn or Churchville, or both, properly to operate the manual block system

It is probable that the failure on the part of Conductor Evans and Engineman Yeakel to obey the instructions contained in train order No. 11 was caused by their anticipating the contents of the order and acting upon that impression rather than upon the instructions contained in the order. The evidence indicates that when Engineman Yeakel was requested to pull up and back in on the siding, he would not do so until he received an order directing him to make the movement, and when he did receive the train order he assumed that the order was the one which he had requested. General operating rule 210, with reference to train orders, reads in part

The copy for each engineman must be delivered to him personally by the conductor or pilot, and the engineman must read it aloud to the person delivering it

General Instructions, Rules for Conductors, rule 1003, reads in part

On passenger trains they will show all orders to traininen * *

Had Conductor Evans and Engineman Yeakel complied with these rules, their mistake would undoubtedly have been discovered. This accident again calls attention to the fallability of the human element and emphasizes the inherent danger in the operation of trains by the train-order system.

It was no oversight on the part of Conductor Evans that train No 151 left Bryn Athyn without a clearance card on the block signal. According to his understanding of the rules the train order he had received gave his train the right to proceed without a clearance card with the block signal in the stop position. If he had had a proper understanding of the rules, immediately after the passage of train No 154 he would have ascertained the condition of the block and thus would have been checked on the misreading of the train order.

The evidence is conclusive that train No 156 left Churchville on a clear block signal when train No 154 still stood on the main track

at signal 716 with the lear of its train east of the signal Train No 151 received "complete" to train older No 11 at 746 m, after which they handled baggage, pulled up and backed in on the siding before train No 154 could even pass signal 716, the order to train No 156 was completed at 744 a m and the train departed from Churchville shortly thereafter. There can be no dispute as to the time the orders were completed by the train dispatcher, as both times were taken from the same clock.

The statements of Operators Clayton and Tomlinson are so conflicting and the condition of their block records such that statements made by them are of little if any value. In view of these conflicting statements it is impossible to determine whether the operator at Bryn Athyn cleared the block to Churchville before the operator at Churchville permitted train No 156 to proceed on a clear block, or whether the operator at Bryn Athyn did not clear the block and the operator at Churchville let train No 156 go on a clear block signal, knowing that the block was still occupied by train No 154

The investigation of this accident disclosed that in this instance all of the safeguards provided for the operation of trains were rendered ineffective by errors on the part of employees involved, misunderstanding of operating rules, and improper practices which had grown up in service

The train-order system failed due to the members of the train crew of train No 151 misreading or neglecting to read the train order establishing the meeting point

The manual block-signal system failed, due to the crew of train No 151 departing from Bryn Athyn without authority when the signal was at stop, and due to train No 156 being admitted to the block under a clear signal when the block was occupied

In addition to the specific failures of the block system which led directly to this accident, investigation disclosed a general laxity in the observation of block signal rules. General rule 317-B, which prescribes the method of blocking trains, is followed by this note

Note —317-B is for absolute block for opposing movements and permissive block for following movements on the same track

Notwithstanding the requirement that a positive block must be maintained for opposing trains, the time-table provides for regular meeting points between schedule trains at Southampton, an intermediate nonblock station located in the block section between Bryn Athyn and Churchville, and opposing trains are permitted to enter the block on a clearance of a caution card

Rule 317-B also reads in part

A train must not be admitted to a block which is occupied by a passenger train except as provided in Rule 331, or by special order

(Rule 331 provides for movement in case of failure of telegraph line)

Train Dispatcher Rich stated it was his understanding that train No 156 might enter the block at Churchville with train No 154 still within the block, provided train No 156 received a caution card

The incomplete condition of the block records at both Churchville and Bryn Athyn, together with the fact that the time was not entered on the record at Bryn Athyn until an hour after, are further evidence of the loose method of operating the manual block-signal system

Circular No 403, dated May 21, 1914, putting the block system into effect in this territory, provides that "Manual telegraph block system will be in operation between Bryn Athyn and Newtown" It also provides that this telegraph block system is in effect at—

Biyn Athyn	630	a n	1 to 720 p m
Churchville	615	a n	to 235 pm
And	335	\mathbf{p} n	to 735 pm
Newtown	6~00	a p	1 to 235 pm
And	335	p n	to 735 pm

It further provides that "In forwarding trains signalmen will be governed by rule 317–B" Under this circular it appears that the manual block section for eastbound trains begins, and for westbound trains ends, at Bryn Athyn station, and so far as can be ascertained in that respect has not been subsequently modified, and was so understood by the employees generally at the time of the accident. Notwithstanding this, it is claimed by officials of the Philadelphia & Reading Railway that while the manual block section for eastbound trains begins at Bryn Athyn station, the manual block section for westbound trains ends at signal 716, some 750 feet east of the station, and that it is proper for the operator at Bryn Athyn to clear the block to Churchville as soon as the real of a westbound train has passed signal 716

There was no uniform or clear understanding as to whether the siding at Bryn Athyn was within the limits of Bryn Athyn station or whether it was within the block section between Bryn Athyn and Churchville, and whether or not it was necessary for train No 151 to have a clearance or a caution card before passing the block signal to back into the siding

Conductor Evans was under the impression that a train order alone was sufficient authority for a train to pass a train-order signal or a block signal in the stop position

The train-order signal at Bryn Athyn is not clearly defined, and the evidence is conflicting as to whether a flag should be used for eastbound trains or whether the block signal should be used

Train No 154 was given a train order to disregard signal 716 upon the assumption of the train dispatcher that the signal was out

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of order, when as a matter of fact it properly indicated there was a train in the block. This order created a dangerous situation, and was given apparently for no other purpose than to avoid delaying train movements. A similar order was also issued to train No 156, but was not delivered

There does not appear to have been any system that required employees to be reexamined on the rules at regular intervals, some of them had not been examined since 1914, and the train dispatcher involved had never been examined

The investigation disclosed extremely lax supervision by responsible officers over the conduct of employees in the observance of ordinary safeguards to train movement. There was no system of instruction of employees to provide a correct and uniform understanding of the rules, nor any effort on the part of responsible officers to correct existing operating practices which were contrary to rules and a constant menace to the traveling public. The laxity with which the manual block system was operated on this line is a condition which could have been easily discovered had any attempt been made by officials to check it up

The plactice of authorizing trains to disregard automatic signal indications frequently upon trivial occasions merely to prevent delay, is dangerous, tends to lead to a disrespect of all automatic block signals, and can not be too strongly condemned

The manual telegraph block system between Bryn Athyn and Churchville is in effect only during the daytime, and this is temporarily suspended at Churchville and Newtown from 2.35 p. m. until 3.35 p. m. each day. An analysis of the train movements between Bryn Athyn and Newtown for the months of August to November, inclusive, indicates an average daily movement of 17 passenger trains and 1.7 other trains. The manual block system which is nominally in effect on this line is entirely inadequate, in view of practices disclosed by this investigation, to furnish the required protection, and while not involved in this accident the order issued by the dispatcher nullified the protection which automatic signal 716 was intended to furnish

To prevent the recurrence of accidents of this character it is recommended that measures be taken promptly by the carrier to insure that employees properly understand and obey operating rules which are provided to safeguard train operation, and that the carner be required to install on this line a complete automatic traincontrol system

All of the cars involved in the accident except the two last cars of train No 151 were of wooden construction and were equipped with the Pintsch gas lighting system. It is probable that many of the lives lost in this accident were the result of the fire which followed

the collision There is no direct evidence that the fire was aggravated by the Pintsch gas which was present in the cars, although it is possible that such was the case

Had all-steel equipment been in service on these trains, it is probable that the casualties resulting from the fire would have been prevented and those resulting from the collision would have been much lessened At the present time, the passenger-car equipment of the Philadelphia & Reading Railway consists of 205 all-steel cars, 90 with steel underframes, 289 wooden cars in actual service and 217 wooden Officials stated it is their policy to keep the steel and cars sui plus steel-underframe cars in through service, while wooden cars are con-The Philadelphia & Reading Railway fined to branch-line service has not purchased any wooden passenger cars for a number of years Prior to the war, it had adopted a well-defined program for the purchase of approximately 50 steel cars per year, but this program was discontinued during the war Since then it is stated that the financial condition of the railroad has been such as not to enable it to continue the purchase of this type of new equipment. At the present time, however, they have inquiries out for additional steel equipment which they hope to purchase in the near future. In this connection it seems not improper to observe that a considerable financial burden has been imposed upon the railroad, as the result of this accident, for which no return is possible. The amount of money which thus will be expended would probably have enabled the railroad to continue its prewar program for the purchase of steel equipment, as well as to intioduce other measures of safety for the protection of the traveling That steel passenger cars afford much greater protection to the traveling public has been repeatedly demonstrated, and this is particularly true when the danger of fire is considered, that the officials of the Philadelphia & Reading Railway recognize the greater security afforded by steel equipment is apparent by their own statements

It is recommended that the Philadelphia & Reading Railway at the earliest practicable date provide steel cars for carrying passengers, and that the use of wooden cars ahead of, or between steel or steel-underframe cars, in passenger trains, be discontinued

Conductor Evans entered the service August 6, 1902, as a switching conductor, was promoted to passenger conductor in 1912, passed examination on the operating rules May 22, 1919, and at the time of the accident had been on duty 9 hours 17 minutes, prior to which he had been off duty over 12 hours

Engineman Yeakel entered the service in 1898, and was promoted to passenger engineman in 1904. There is no record of his last examination on operating rules. At the time of the accident he

had been on duty 9 hours 47 minutes, prior to which he had been off duty 11 hours 43 minutes

Operator Clayton entered the service as station agent in 1902, was examined on the rules in 1914, and at the time of the accident had been on duty 1 hour 25 minutes, prior to which he was off duty 15 hours

Operator Tomlinson entered the service as agent in 1907, was examined on the operating rules in 1914, and at the time of the accident he had been on duty 2 hours 40 minutes, prior to which he had been off duty 15 hours

Respectfully submitted,

W P Borland, Chief, Bureau of Safety



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FIG 2-LOOKING EAST FROM TOP OF CUT SHOWING BURNING CARS OF TRAIN NO 155



FIG 3 -CLOSE UP VIEW OF WRECKAGE IN OUT, BURNED CAR ON LEFT



