

To: Canada Transportation Act Review Secretariat:
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I have only recently become aware of this review and hope to submit a more detailed response in subsequent rounds of comments. Although I am on the Board of Directors of Transport Action Atlantic, I have not had time to submit this for a formal review and thus these comments are my own and not official policy of the board. While I am retired from the computer programming and operating systems support field, I have had a life long interest in transportation. I'm a United States citizen and permanent resident in Nova Scotia. In the United States I was a member of the Committee for Better Transit, the Electric Railroaders Association and the Bloomfield, New Jersey Transportation Committee. I joined Transport 2000 Atlantic in 1995 (now Transport Action Atlantic). I have ridden much of the Canadian passenger rail network, my earliest ride being in 1957, long before moving to Canada. I keep up with both trade and enthusiast periodicals from North America and Europe. The enthusiast periodicals are valuable because many times they are the source of information about what doesn't work and things that are less than perfectly executed. I also participate in online forums that include professionals in the field. The discussion paper has given me much food for thought. Some brief comments follow.

On an overall basis, governments at all levels need to review the effects of having mode specific policies. For example, does it make sense to tax rail rights of way when there are no taxes or imputed property taxes on highway rights of way and waterways? As someone who has tried in the past to balance mode specific tax and fee revenues with the government expenditures for that mode, I would be interested in seeing the data behind the statement in the last paragraph of section 5 of the discussion paper. I would urge that if this statement is accurate, that the policies be continued because they make better sense than those of the United States. It would be good to know that the Saint Lawrence Seaway is no longer a drain on the taxpayer and that the ice-breaking and locks are being paid for by the users. Regulations such as insurance requirements need to be the same for all modes.

I urge people interested in the rail issues to investigate the web-site http://zierke.com/shasta_route. Hans-Joachim Zierke, a German student of transportation policy, created it to explore the possibilities of high speed rail between Portland, Oregon and San Francisco, California. To explain the differences between North America and Europe to a presumed European audience, he gives a good overview of how the current North American system has come to pass. While the web site is aimed at the United States environment, the Canadian environment is much the same and the site has greatly increased my understanding of various issues. It contains insights such as snow clearance on Interstate 5 is the responsibility of the government, while for rail in the area it is the private hobby of the Central Oregon and Pacific Railroad. The web site has a suggestion for a low cost rail transit operation and what changes in North American rules would be needed for it to be practical. At 50 pages for the site, reading it should not take an excessive amount of time. Hans-Joachim Zierke's writing is clear, readable and to the point.

In regard to 4.1, I would note that in general North American rail is specializing in the longer haul and those commodities most suited for rail transportation. Major decisions will have to be made if it is desired to move freight that requires truck competitive or faster than truck speeds to rail. In some provinces the rights of way are far more circuitous than the highways and would have to be bypassed or have major upgrades. Even where they are as direct as the highway, handling mixed speeds requires

more infrastructure.

On rail passenger service, it should be decided what services are needed. One of the major revolutions in Europe has been the revival and regularization of services that connect rural communities with major and regional centres. There would probably be hourly or every other hour trains on a line comparable to Montreal - Toronto serving all of the smaller communities like Cornwall and Cobourg. The equipment would be 1 - 3 car Diesel or Electric Multiple Unit trains with a 1 or 2 person crew - an engineer and maybe some one to aid passengers and check fares. Via staffing should be compared to various comparable European operations to see what efficiencies can be obtained. Most important, a means to pay for reliable schedules while preserving the ability of freight railroads to run their business and serve their customers at the customer's convenience must be found. The buffing strength rules need change because North American trains are heavier than their European counterparts leading to fuel waste and at higher speeds, more track maintenance. The reason to make an effort to expand rail passenger service is that it is better suited to connecting major towns and smaller cities than bus or plane. In many cases rail lines come through the main part of a community, not on the outskirts. Time isn't lost getting on and off the freeway. With proper expenditure rail can be faster than bus yet as economical to operate. Passenger service, while probably losing money, does not have to be as resource inefficient as it is in North America. Note that Via and especially Amtrak are more efficient than their private predecessors. Also ramping up services can lower costs per passenger served. It will be worth the hard and difficult negotiations with host railroads to make this work.

In regard to section 5, some Europeans have claimed that providing infrastructure improvements is more costly in North America than it is in Europe. Germany in many cases can provide infrastructure that meets exacting environmental and accessibility standards for less cost than the North American counterparts. This is taking wage cost differentials into consideration. Legal frameworks and dispute resolution need as much attention as any of the technical areas. In so far as possible, governments need to make certain that they don't favor road or water over rail. The comments in the discussion paper on mode neutrality are welcome and efforts to make them reality are worth while.

In regard to gateways discussed in section 7, more attention needs to be paid to the question of why most of the United States – Canada cross border traffic is by truck. If the reason is that in most cases it short haul and relatively local to the crossing area as may well be the case in Windsor – Detroit area, that is one thing. If it because it is harder and more time consuming to get rail freight across the border, then government action is needed.

If cross border rail passenger services such as Vancouver – Seattle, New York – Toronto and Montreal – New York are to expand and prosper, then an hour for pre-boarding inspection or on train inspection is not acceptable. If it could be quick and seamless between Belgium and Germany in 1966 despite World War II enmities, then the United States and Canada should be ashamed that the International service between Toronto and Chicago was ended because of excessive border delays (I believe mostly at Port Huron on the United State side).

On governance, it needs to be as little as feasible, but what governance is needed must be staffed properly and the governance must be appropriate to the purpose. For example, if it can be shown that requiring adequate insurance for disasters for a given mode will result in the insurance company protecting itself by doing actual, not just paperwork inspections and having the clout to make sure safety recommendations are carried out, then the need for government inspectors may be lessened. On

the other hand some safety enforcement can not be left to insurance companies and for that the government must have adequate and qualified staff doing the enforcement including actual, not just report review inspection.

On item 10, Accessible Transportation, government should pay the difference between the cost of carrying a special needs passenger (wheelchair, requiring attendant, etc.) and the cost of carrying an adult without special needs. This includes the cost of any fare reductions.

There is no mention of public transit, and it is a set of local needs across the nation. I believe that in many ways the various urban and rural transit agencies have been blessed by not having to deal with a federal bureaucracy and another master. However care must be taken to make sure that the federal government doesn't inadvertently (or even intentionally) flavor the private automobile or specific modes of transit over other modes. The government should do nothing to discourage long distance and local carriers from working together. Any existing barriers to cooperation must be removed. Nothing should stand in the way of the provinces deciding to give bus and in street rail priority in traffic because both modes can make more efficient use of street space.

In conclusion, we need a transportation system that meets the needs of Canadians be they urban or rural. I look forward to the work of the panel. The discussion paper is a good start but it is only a start. The problem is defining goals and values given the many competing interests.

Thank you for your attention.

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