

OTTAWA MAINTENANCE PROJECT Alstom Canada

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Mr. Mario Guerra Chief Executive Officer, Acting General Manager Rideau Transit Maintenance General Partnership 805 Belfast Road Ottawa, ON K1G 0Z4

Ottawa, May 14th, 2021

Letter No.: ALSMNT-RTM-0813

In reply to: None Action: RTM

Letters Ref.: ALSMNT-RTM-0083, RTM-ALS-0023

Subcontract: Second Amended and Restated Maintenance Subcontract dated September 16, 2019

("Subcontract"), Part 2 - Article 34

Subject: Requirement to Increase the Number of Hostlers

Dear Mr. Guerra,

RTM's immediate attention is drawn to the current workload situation of the Hostlers. In light of the recent Safety measures implemented following the recent LRV Derailments as detailed below, the number of Hostlers is becoming severely insufficient to attend to the train movements:

- New containment actions on Track 14 requiring to have 1 hostler on each end of the train. This is especially detrimental during the launching window of the trains. Considering Track 14 is one of the most critical tracks in the yard, this reducing drastically the number of Hostlers available to move the trains.
- There are 2 switches in the yard (513 and 514) which now must be thrown manually where previously this was performed remotely via the YCC. These are high traffic switches which continuously need to be operated and as such this change imposed now requires a high level of intervention from the hostlers.
- City's new requirements for both sides of the trains to be inspected Daily. When the train are parked in the shed, only 1 side of the train is accessible. The Hostlers now need to conduct additional moves to enable the technicians to check both sides of the trains.
- New extensive checklist has been implemented for de-energized train moves by Hostlers. Such checklist requires at least 25 min per checklist for 2 Hostlers per LRV.

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> The current shift and workload of the Hostlers is overloaded. The Hostlers are suffering from fatigue and reduced resting time. Alstom is attempting to mitigate as much as possible and move the train whilst adhering to the Safety protocols, however RTM's attention is required in order not to affect the safety of such train moves.

The current number of Hostlers is insufficient and Alstom requests RTM immediate approval to increase the Hostlers to 28 Hostlers and 2 Leads/Supervisors. Alstom shall not be liable for any reduced number of train movements in consequence of the reduced number of Hostlers, as Alstom further reminds the following:

- the Hostler service was provided to RTM as a temporary Unmanned Train Operation replacement activity that is not under Alstom's responsibility under the Subcontract
- Alstom will not perform an activity knowing that the safety of its employees may be compromised

Please be notified that Alstom presents this letter without waiving and with express reservation of Alstom's rights and remedies as may be available under the Maintenance Subcontract Agreement, any other contract, applicable law, rules or regulations whether at law or in equity. In no event shall this letter constitute nor be deemed to be a waiver by Alstom of any of its rights or remedies with regards to the above

Sincerely,

Richard France Project Manager

Attachment(s):

cc: James Messel, RTM Tyler Conley, Alstom Karim Farran, Alstom