



U.S. Department
of Transportation

**Federal Railroad
Administration**

Memorandum

Date: January 12, 2000

Reply to Att. of: MP&E 00-01

Subject: Enforcement Guidance for Inspecting and Testing Brakes on Cars while on Shop or Repair Track

From: Edward R. English
Director, Office of Safety Assurance and Compliance

To: Regional Administrators, Deputy Regional Administrators,
Motive Power & Equipment Specialists and Inspectors

Recently, there has been some confusion over the testing and repairing requirements of brakes on cars that are repaired on a shop or repair track. Particularly, when a mobile repair vehicle is involved.

49 CFR 232.17(a) contains certain inspection and testing requirements of a car's brake system, when a car is on a "shop" or "repair" track. For example; an application and release of brakes must be performed, piston travel must be inspected and adjusted (if necessary), and certain brake system components must be inspected to ensure they are properly positioned and secured. In addition, such cars must receive periodic attention in accordance with the requirements of the currently effective AAR Code of Rules for cars in interchange. AAR rules require that any car on a shop or repair track receive a repair track air brake test if such attention has not been provided to the car within the previous twelve months.

The current regulation does not define what constitutes a shop or repair track. Although AAR's Field Manual of Interchange Rules contains a definition of shop/repair track, FRA believes that AAR's definition is too narrow and does not adequately delineate what constitutes a repair track for the purposes of §232.17(a). FRA believes the definition fails to adequately consider locations where mobile repair vehicles serve in the same capacity as a fixed repair facility and locations where railroads designate tracks as "expedite" or "light repair" tracks for the purpose of performing minor repairs.

In 1994, FRA provided guidance in Technical Bulletin MP&E 94-18, that only light or minor repairs are to be conducted on tracks designated as "expedite" or "light repair" tracks.

Currently, FRA does not require railroads to perform air brake related inspections and tests, pursuant to §232.17(a), on cars receiving minor repairs (i.e. straighten safety appliances, replace handholds, replace air hoses, adjust lading, replace coupler knuckle pin, knuckles, etc...); provided, the repair work is performed on tracks located outside of a repair shop area. Nor does FRA require the performance of these inspections and tests on a car if a mobile repair vehicle is sent to a remote location to make necessary repairs to the equipment.

However, at locations where a railroad has designated specific tracks to perform repairs on a regular and consistent basis, and when the repairs conducted on those tracks include major repair work (i.e., wheel change, coupler replacement, draft gear repair, repairs requiring an air jack, etc...), FRA considers those tracks to be repair tracks for the purposes of §232.17(a). This includes locations where mobile repair vehicles have replaced a fixed repair facility or serve in the same capacity as a fixed repair facility. FRA believes it is both illogical and inconsistent with the intent and meaning of the existing regulations to exempt tracks at locations where repairs of all types are regularly and consistently performed, from being considered repair tracks merely because they are serviced by a mobile repair vehicle. Furthermore, it would be inconsistent with previous guidance provided by FRA to allow major repair work to be performed on the “expedite” or “light repair” tracks, merely because the repairs are performed by a mobile repair vehicle. It should be stressed that FRA does not intend to prevent a railroad from designating certain tracks for conducting minor repairs and certain tracks for conducting major repairs at the same location.

Consequently, FRA considers the provisions of §232.17(a) applicable to fixed repair facilities and any location where repairs of all types are regularly and consistently performed, regardless of whether a mobile repair vehicle is used to conduct the repairs. FRA does not consider tracks that are designated only for minor repairs to be a repair track pursuant to §232.17(a); provided such track is used only to conduct minor repairs. However, if a major repair is performed on a car located on a track designated for minor repairs, then the car is subject to the provisions of §232.17(a) before it can be placed in service.

Please be governed accordingly.

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