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**Thursday, June 23, 2005**

**C-10132**

**Circular Letter**

**Subject: Implementation of Advanced Technology Safety Initiative (ATSI) Rule Changes---Opportunistic Repair: Rule 41.A.2.I**

**To: MEMBERS AND PRIVATE CAR OWNERS**

**File Number: AC-2324**

On September 7, 2004 Circular Letter c-9912 was issued announcing both approved ATSI changes as well as changes still under consideration for the Office and Field Manuals of the Interchange Rules. Since that time, Circular Letter c-9930 was issued on October 21, 2004 announcing the adoption of Appendix F, Wheel Impact Load Detector Calibration and Validation Requirements along with a change to Rule 41.A.1.r.(1). On January 1, 2005 both the Field and Office Manuals of the Interchange Rules were updated accordingly.

Most recently, the Arbitration and Rules Committee discussed ATSI requirements again at its April, 2005 meeting and decided that additional rule changes previously identified as pending were ready for reconsideration. More specifically, the Committee was of the opinion that rule changes necessary to implement the "Opportunistic Repair" piece should be reissued for comment. On April 28, 2005, Circular Letter C-10081 was issued to solicit comments on rule revisions to implement Opportunistic Repair in Rule 41. Comments received were first considered at a Committee conference held on May 20th. Comments received after May 20th were also forwarded for Committee consideration as well.

The comments received this time in part repeated past commentary on the ATSI Rule changes, such as, questioning why the proposed rule is needed, expressing concerns that the economics are skewed and concerns over the calibration frequency of the WILD sites were noted. The Committee concluded that the rationale for implementing this proposed rule is to take advantage of condition-based maintenance opportunities when a car is on shop or repair track with a wheel in the 80 to 90 kip range. It promotes efficiency to remediate a wheel that is approaching the condemning limit if the car is already on a repair track for another reason and thereby avoiding the need to take the car out of service a second time when the condemning limit is reached. With respect to the economic concerns, the economic evaluations that have been undertaken demonstrate to the Committee's satisfaction that the initiative does reduce overall system costs. The railroads are proportionately funding the costs to develop and maintain the Equipment Health Management System (EHMS). The respective EHMS fees for car owners and railroads are now included in Appendix E of the Office Manual. With respect to the WILD site calibration frequency, the AAR through its MID field forces monitors compliance with the requirements of Appendix F. Should data become available that would suggest that the frequency is incorrect, the AAR will make appropriate adjustments.

With the solicitation of comments on Opportunistic Repair, new issues were surfaced by the commenters. These included; why not let the industry conclude root cause analysis first; and has the potential impact on wheel supply been considered? Concerns were again repeated about WILD sites, suggesting that some sites may be unreliable. As mentioned the Committee considered the comments and made an adjustment shown in bold to the definition of Why Made Code 61. On the matter of adversely impacting wheel supply, an analysis was conducted to determine the impact and provided to Committee members. With respect to waiting for the completion of root cause analysis, the Committee stands ready to address any potential rule changes that may surface when that effort is completed. The approved revisions are repeated below. Please note that in C-10081 the proposal was to add a new 41.A.2.k which was used for the 1995 Southern wheel issue and this ATSI proposal is now relettered as I.

**Rule 41-Wheels**

**A. Wear Limits, Gaging, Cause for Renewal**

**2. Condemnable When Car is on Repair Track for Any Reason**

**Present I: Vacant**

**Approved new I** : Detected by a wheel impact load detector reading from 80 kips to less than 90 kips for a single wheel. The detector used must have been calibrated per Appendix F. The detector must reliably measure peak impacts and must provide a printable record of such measurements. Device calibration records must be maintained. Wheels with condemnable slid flat spots are handling line responsibility and must not be billed otherwise. This will be considered an Opportunistic Repair for the repairing party.

**Rules 41 (Wheels) and 83 (Repair Record Preparation)**

**Add new Why Made Code (WMC) to Field Manual Rule 41.F. 6 and 83.18.C:**

61 = High impact wheel from 80 kips to less than 90 kips as detected by a **calibrated and validated** wheel impact detector.

**Add WMC 61 to 41.F.6 Job Codes 3001 through 3114.**

These changes become effective on July 1, 2005 and will be included in that Supplement to the Field Manual.

**Sincerely,  
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**Safety and Operations**

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