

**APTA Background/Introduction
For Initial Inspection of Welds
Used as Part of the Safety Appliance Attachment System
on Existing Rail Passenger Equipment**

The Federal Railroad Administration (FRA) interprets Federal safety appliance regulations to prohibit the use of welds in the attachment system securing safety appliances to carboodies. A problem arises because this prohibition is not stated in the Code of Federal Regulations. One needs to refer FRA bulletins and letters that are not widely available to understand this prohibition.

As a result, over the past 20 years approximately 850 passenger cars have been built and have entered service that use welds as part of their safety appliance attachment system. All of these cars have provided safe service with no reported incidents of injuries caused by failure of welds in the safety appliance attachment system.

Recently, FRA started a campaign to force railroads operating this equipment to modify the equipment to eliminate all use of welds in the safety appliance attachment system. Due to the high cost of this retrofit program and the perfect safety record of the existing safety appliance attachment systems, the American Public Transportation Association (APTA) requested that FRA reconsider.

FRA responded by holding a special safety inquiry to gather information that could help them make a decision. Many APTA members provided testimony. APTA summarized their testimony by requesting:

- 1) FRA allow this existing equipment to continue in operation without modification
- 2) FRA consider in what circumstances and under what conditions might welding be allowed as part of the safety appliance attachment system
- 3) FRA clarify the CFR to make it stand alone, eliminating the need for reference to lesser documents
- 4) FRA consider using the RSAC process to accomplish steps 1-3.

FRA agreed to use the RSAC process. At the first meeting of the safety appliance RSAC working group, FRA requested that the APTA team developed a proposed weld inspection program as a necessary condition to allow existing equipment to continue in service without modification. What follows is APTA's initial proposal for such an inspection program.