Memorandum

U.S. Department
Of Transportation

Federal Railroad Administration

Date: APR 2 5 2007

Reply to Att. of: MP&E 07-02

Subject: Guidance for Record Keeping of Annual Periodic Inspection of the Hand or Parking Brake on Passenger Cars and Unpowered Vehicles Used in Passenger Trains, 49 CFR § 238.307(d)(2).

From: Edward W. Pritchard
Director, Office of Safety Assurance and Compliance

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

On October 19, 2006, the Passenger Equipment Safety Standards; Miscellaneous Amendments and Attachment of Safety Appliances on Passenger Equipment was published as a final rule. As a result of those amendments, there is now a requirement to inspect the hand brake or parking brake and its parts, and record the inspection at an interval not to exceed every 368 days.

Rule Text

§ 238.307 Periodic mechanical inspection of passenger cars and unpowered vehicles used in passenger trains.

(d) At intervals not to exceed 368 days, the periodic mechanical inspection shall specifically include the following:

* * *

(2) Inspection of the hand or parking brake as well as its parts and connections to determine that they are in proper condition and operate as intended. The date of the last inspection shall be either entered on Form FRA F 6180-49A, suitably stenciled or tagged on the equipment, or maintained electronically provided FRA has access to the record upon request.

During the drafting of the rule text, the requirements for testing and record keeping were copied from similar requirements applicable only to locomotives. As a result, the form specified in the rule, Form F 6180.49A (Blue Card), is a locomotive form. However, FRA did not intend to limit use of an onboard record to a Blue Card for keeping test information under this section, especially for equipment that is not a locomotive. Therefore, FRA makes clear that the onboard record may be kept in any manner chosen by the railroad as long as it contains all the required information and is legible. The record does not have to be a Blue Card. Further, railroads may also stencil the information or keep the information electronically, as provided in the section.

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