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Hillside Maintenance Complex
93-59 183 Street
Hollis, NY 11423

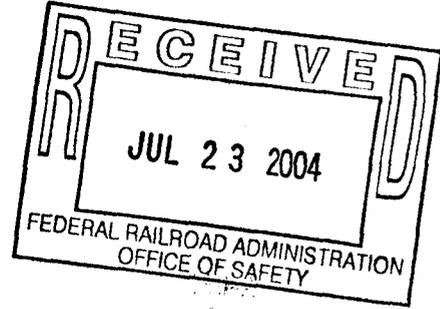
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President

FEDERAL RAILROAD
ADMINISTRATION

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Long Island Rail Road
CHIEF COUNSEL



July 22, 2004

Mr. Grady C. Cothen, Jr.
Associate Administrator for Safety
Federal Railroad Administration
1120 Vermont Avenue
Washington, D.C. 20590

FRA-2004-18854-1

Subject: **Petition for Waiver of 49 CFR 229.27(a)(2) and 49 CFR 229.29(a) for a Control Group of Five EMD DM30-AC Locomotives**

Dear Mr. Cothen:

The Long Island Rail Road (LIRR) currently operates 46 EMD DE/DM30-AC locomotives equipped with New York Air Brake (NYAB) CCB I brake equipment. The current periodic brake equipment maintenance intervals have been established at 1840 days (five years) in accordance with FRA Docket 2000-7367. In October 2003, NYAB and LIRR jointly performed detailed teardown inspections on a complete set of CCB I brake components from a randomly selected locomotive at the end of a five-year COT&S interval. The attached test report, ABT-3164-6, illustrates the results of the teardown and inspection, and concludes that the equipment can be used safely with greater overhaul intervals.

To facilitate testing for consideration of increased service intervals, the LIRR requests a temporary waiver from requirements of 49 CFR 229.27(a)(2) and 49 CFR 229.29(a) for a control group of five locomotives. Approval of this waiver petition would permit continued operation of the test locomotives with extended CCB I brake maintenance intervals beyond the established five-year interval. During the testing period for the control group, the remaining locomotives in the LIRR fleet will continue regularly scheduled periodic maintenance of CCB I equipment at the established 1840-day interval. To ensure the safety of the equipment and to provide data necessary to evaluate extended service intervals, LIRR proposes additional testing and teardown inspections in accordance with the schedule in Table 1. Results of the testing and teardown inspections would be used to evaluate further extensions of the five-year COT&S interval in one-year increments.

Table 1. CCB I Equipment Test Schedule

Locomotive # Date In Service	2208 days (6 yr)	2576 days (7 yr)	2944 days (8 yr)
512 8/31/99	Test CCB I system on locomotive; Remove, disassemble and inspect CCB I components jointly between LIRR, OEM and FRA. Issue reports		
516 10/13/99	Test CCB I system on locomotive	Test CCB I system on locomotive; Remove, disassemble and inspect CCB I components jointly between LIRR, OEM and FRA. Issue reports	
521 10/4/99	Test CCB I system on locomotive	Test CCB I system on locomotive; Remove, disassemble and inspect CCB I components jointly between LIRR, OEM and FRA. Issue reports	
522 11/18/99	Test CCB I system on locomotive	Test CCB I system on Locomotive	Test CCB I system on locomotive; Remove, disassemble and inspect CCB I components jointly between LIRR, OEM and FRA. Issue reports
502 11/22/99	Test CCB I system on locomotive	Test CCB I system on Locomotive	Test CCB I system on locomotive; Remove, disassemble and inspect CCB I components jointly between LIRR, OEM and FRA. Issue reports

To: Associate Administrator for Safety
Re: L.I.R.R. Petition for Waiver of 49CFR 229.27(a) (2) and 49 CFR 229.29(a)
For a Control Group of Five EMD DM30-AC Locomotives

July 25, 2004
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The LIRR and NYAB are currently in the process of establishing test plans to specify the on-locomotive tests and teardown inspection procedures for the CCB I components removed from the locomotives. The plans will be submitted to the FRA for approval when they are completed.

The following person at the Long Island Rail Road has been designated as the primary contact for issues regarding this waiver petition:

Afshin Hezarkhani
General Manager – Fleet Engineering
Long Island Rail Road
93-59 183rd Street
Mail Code 3024
Hollis, NY 11423

Your timely response to this petition is critical and will be greatly appreciated as the five chosen control group locomotives are the last five in the LIRR fleet that have been in service less than five years. The first scheduled five-year COT&S for the control group is due in September 2004.

Sincerely,



Mark P. Sullivan
Chief Mechanical Officer

Attachments:

1. Test Report ABT-3164-6: Long Island Rail Road CCB I Equipment Teardown and Inspection