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Executive Director, Rules and Standards



November 6, 2019

[C-13438]

Circular Letter

Subject: Solicitation of Comments to include Longitudinal Lumber Pack (LLP) dunnage system in Figures 54 and 54-B, Lumber on Center A-Frame Flatcars with Cable Tie-downs – Section 5 of the AAR Open Top Loading Rules Manual (OTLR)

To: MEMBERS AND PRIVATE CAR OWNERS

File Number:LR 2.8.150 and 2.8.151

The AAR's Open Top Loading Rules Committee (OTLRC) requests comments from the industry to include Longitudinal Lumber Pack (LLP) dunnage system in Figures 54 and 54-B – Section 5 of the AAR Open Top Loading Rules Manual (OTLR). See below:

- LR 2.8.150 – Section 5, Fig. 54:
 1. Inserted sketches and photos of new void filler dunnage system for better understanding,
 2. Added a new item F – Void filler: LLP dunnage system with description, comprised of two honeycomb end panels and five wax coated/weather resistant sono tubes. Panels must be wrapped/protected from the elements. This system is required in bottom 2 layers on both sides of the car with voids from 13 in. up to 36 in. Void filler must be secured to prevent displacement.
 3. Moved the existing Item F, Cables to Item H to maintain consistency with other figures, and
 4. Added a new note #2, "Load must comply with Item F when either of the bottom two layers have voids of 13 in. to 36 in.," and renumbered the existing notes.

- LR 2.8.151 – Section 5, Fig. 54-B:
 1. Inserted sketches and photos of new void filler dunnage system for better understanding,
 2. Added a new item F – Void filler: LLP dunnage system with description, comprised of two honeycomb end panels and five wax coated/weather resistant sono tubes. Panels must be wrapped/protected from the elements. This system is required in bottom 2 layers on both sides of the car with voids from 13 in. up to 36 in. Void filler must be secured to prevent displacement.
 3. Moved the existing Item F, Top Corner Cap to Item N, and
 4. Added a new note #2, "Load must comply with Item F when either of the bottom two layers have voids of 13 in. to 36 in.," and renumbered the existing notes.

Therefore, in accordance with the requirements of AAR Rule 123, comments are herein solicited and should be sent with any additional attachments to Mr. Rama Maram, Manager – AAR Open Top Loading Rules via email at otlr@aar.com (<mailto:otlr@aar.com>). Comments may also be placed directly on the attached figure for clarity and submitted.

All comments, relevant to these figures, received within 30 days from the date of this Circular Letter will be considered by the OTLR Committee prior to any action on the implementation of Figures 54 and 54-B – Section 5 of the AAR Open Top Loading Rules Manual (OTLR). The AAR has a long-standing practice of seeking comments on the changes and additions to rules or standards that may affect stakeholders. All are encouraged to voice their opinions with comments and questions to Mr. Rama Maram, Manager – AAR Open Top Loading Rules via email at otlr@aar.com (<mailto:otlr@aar.com>).

Railroads are asked to ensure that copies of this circular letter are distributed to all concerned shippers and railroad personnel for their attention and guidance.

Sincerely,
Nichole Fimple
Executive Director, Rules and Standards

Safety and Operations
Association of American Railroads
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Attachment(s):

Section5p1.Fig 54.20191031.pdf (<https://my.aar.org/myAAR/ePubs/Circulars/Circular Attachments/Section5p1.Fig 54.20191031.pdf>)

Section5p1.Fig 54-B.20191031.pdf (<https://my.aar.org/myAAR/ePubs/Circulars/Circular Attachments/Section5p1.Fig 54-B.20191031.pdf>)