



# Brotherhood Railway Carmen Division

*Transportation Communications Union / IAM*

**Donald E. Grissom**  
General President

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Mr. Amitabha Bose  
FRA Administrator

Over the last several years, the BRC has been intent on developing a mutually beneficial relationship with BNSF Railway involving the use of advancing technologies in maintenance, diagnostics, and repair of capital equipment. This partnering relationship has emphasized the complementary nature of technology with the inspection and repair skills of trained BRC members and demonstrated the improvements to safety related components (brakes) and safety related performance of railcars and trains when they are combined. The preliminary focus has been with technology like Brake Health Effectiveness (BHE) for braking, and vision systems in general. Several key developments have occurred with this new relationship:

- BRC & BNSF Railway have created special Carmen positions imbedded at BNSF's Network Operations Center who utilize wayside vision systems to evaluate trains departing from selected originating and/or intermediate terminals. These positions have helped support the use of such systems. The parties have agreed to work together in collaboration with the FRA to utilize vision-based technology inspection and detection for select originating and/or intermediate terminals.
- BRC has been partnering with BNSF & FRA in using Hot/Cold wheel detectors as part of the BHE (Brake Health Effectiveness) test waiver **FRA-2018-0049**, leading to more ASCT events and car repairs for BRC Carmen resulting in a very positive impact on safety and car & train braking performance.
- In 2023, the BRC went on record with the FRA in support of the expansion of BHE technology beyond intermodal and grain trains to coal trains. We are collectively waiting for the FRA to approve this new initiative.



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BRCA believes that we can expand this relationship with a first of its kind effort to improve safe operations, reduce congestion and improve safety of cars at our Southern border with a special program using a technology and BRCA Carmen oversight approach to the international inspection required of trains crossing the US-Mexican border into the United States. BRCA is willing to support a waiver or test program that would allow for trains which have been subject to a technology package both in the United States and Mexico to move continuously across the border to forward BNSF repair points in the United States where BRCA will inspect and finalize the ongoing technology review process, which combined will accomplish 100% of the QMI inspections for continuing to US destinations. This partnership in the combined electronic inspection process would improve safety of moving equipment with BRCA oversight in the US and in Mexico. This process could reduce congestion at the border, reduce residential blocked crossings in border municipalities, reduce stopping equipment that can be boarded by unlawful individuals, and enhance wayside technology that will reduce potential derailments on equipment moving out of Mexico.

Sincerely,



D. E. Grissom  
Carmen Division General President



Daniel Chancellor  
National Representative