



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

# Memorandum

Date: June 15, 1998

Reply to Att. of: MP&E 98-13

Subject: Interpretation of Sill Step Application, 49 CFR Parts 231.1(d)(2) and 231.27(c)(2)

From: Edward R. English  
Director, Office of Safety Assurance and Compliance

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

It has been brought to the Office of Safety's attention that some sill step applications on certain types of cars are being considered by field forces as noncomplying conditions under the Railroad Safety Appliance Standards when in fact, the sill steps are in compliance. To minimize confusion in this area, the following guidelines should be used when considering sill step applications.

49 CFR, Parts 231.1(d)(2) and 231-27(c)(2) address both, Sill Steps Dimensions and provide the minimum standards for cross-sectional area, material, length and clear depth. The minimum standard for clear depth is 8 inches. *Please note carefully* the words, "clear depth". Clear depth should be understood as meaning a vertical space the width of, and above, the sill step material or strap, and that vertical space shall be clear and unobstructed for 8 inches.

Note how this differs fundamentally from the dimensions requirements for handholds and ladder treads in the Safety Appliance Standards which stipulate, "minimum clearance..., 2 inches ...." No limiting direction orientation for clear space is provided, therefore clearance of 2 inches is required in all directions or 360 degrees around the handhold or ladder tread.

As in all considerations of safety appliances, whether or not the appliance can be used "safely" must be considered along with the clearances and dimensions.

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