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## HM-265 COMMENT EXTENSION DATE

By Gary Alderson – AllTranstek L.L.C.

The comment date for HM-265 has been moved to April 28, 2025. Please reference PHMSA-2018-0080 (HM-265) and submit your comments to <https://www.regulations.gov> and follow the instructions for submitting comments. You can also fax to 1-202-493-2251 or mail your comments to U.S. Department of Transportation, West Building, Ground Floor, Room W12-140, Routing Symbol M-30, 1200 New Jersey Avenue SE, Washington, DC 20590. Follow the instructions in rule HM-265 <https://www.govinfo.gov/content/pkg/FR-2025-01-08/pdf/2024-31077.pdf> when submitting your comments.

## CTQ PURCHASING

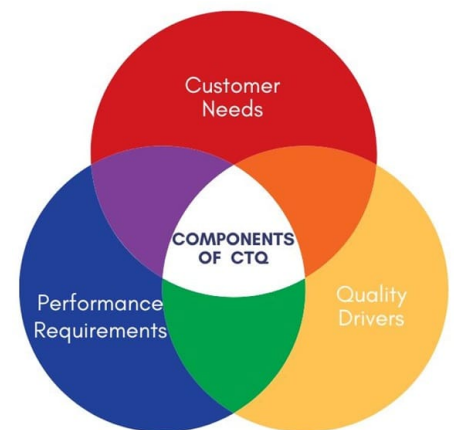
By Ben Masters – Progress Rail

To communicate CTQ requirements, we must first ensure that we understand what Critical to Quality (CTQ) is. Though the M-1003 does not define the term Critical to Quality (CTQ), CTQ is simply a measure of the quality of a product/service requirement in the eyes of the user. It includes all the essential attributes/critical needs that the user identifies in a product/service that makes the product/service useful for the intent for which the product/service was designed.

The essential attributes/critical needs are developed during the design phase for a product/service that a customer has chosen to purchase and are passed on to a company for production. When a company begins the purchasing process for the materials to create the product/service, these CTQ items must be recognized by the development team and passed on to the purchasing team in the form of specifications and/or drawings. These CTQ items must be clearly identified and sourced from approved suppliers capable of meeting the requirements.

When identifying approved suppliers for CTQ materials, keep in mind the following: The M-1003 provides that a facility shall identify the products/services (CTQ) items to be purchased or subcontracted.

As such, the M-1003 lays the groundwork for the approval process for suppliers and subcontractors, the process for maintaining said groups on an approved vendors list as well as the means for the verification of material requirements that must be passed on to the purchasing group to help ensure that CTQ requirements



are met and the integrity of the product/service being provided is maintained. Requirements for providing evidence of verification can include: mill certificates, heat treat records, chemical composition records, tensile and yield strength reports, etc. These requirements are included in the request for quotation and purchase order process.

The critical needs for products/services must be identified to provide evidence for compliance. Companies may utilize more formal processes including the PPAP (Production Part Approval Process) with the applicable requirements based on risk mitigation levels. The PPAP method consist of 18 primary elements the purchaser can choose to require or waive for a CTQ item based on risk levels:

1. Design Documentation
2. Engineering Change Documentation
3. Customer Engineering Approval
4. Design Failure Mode and Effect Analysis (DFMEA)
5. Process Flow Diagram
6. Process Failure Mode and Effects Analysis (PFMEA)
7. Control Plan
8. Measurement System Analysis Studies
9. Dimensional Results
10. Records of Material / Performance Tests
11. Initial Process Studies
12. Qualified Laboratory Documentation
13. Appearance Approval Report (AAR)
14. Sample Production Parts
15. Master Sample
16. Checking Aids
17. Records of Compliance with Customer Specific Requirements
18. Part Submission Warrant (PSW)



## IMPROVING QMS AUDIT EFFECTIVENESS

By Bob Wolbert – Progress Rail

In the spirit of focusing on continual improvement, we must remember to pull the available levers in the quality management system (QMS) auditing process. Let's look at some of the available opportunities.

### Auditing agency selection and improving their effectiveness.

In an ISO environment the company can select/change the registration company and auditor selection when deemed necessary. The relationship between audit agency and their auditors must be built on a common premise that they are there to independently audit and thereby add value to the company's QMS through observations/findings made during the conduct of the audit. Auditing agencies and their audit staff need to be assured of the positive impact of uncovering these opportunities to improve compliance. It's incumbent on the facility's personnel supporting the audit to reinforce that message.

In an AAR auditing environment, agencies/auditors are assigned to some extent by geographic locations or activity code rationale. In this circumstance the facility being audited has limited control to effect change. The AAR QAC (Quality Assurance Committee) has discussed the benefits of changing the auditor at least once in the three-year cycle as an improvement aimed at adding value to the audit process. The audit survey process is an excellent way to provide feedback to both the agency and the AAR QAC on audit performance

improvement. Here again, if the facility's personnel involved in the audit process fail to communicate the perceived positive impact of finding improvement/compliance opportunities noted by the auditor, the auditor could be impacted by a non-supportive audit adverse environment.

#### Avoiding auditor familiarity and complacency.

One of the eventualities of being audited by the same registrar is that the auditor(s) performing repeated audits of the same company become familiar and assured of the quality management system maturity and deployment which can lead to inadvertent complacency. Requiring a different auditor once or more per 3-year cycle and/or working with your lead auditor to change assignments for team members can promote improvement to the depth of the auditing process.

#### Promote a conducive environment.

At a recent auditor's conference, the statement was made to the audience regarding audits and their intended outcome as adding value to the facility being audited. Several comments voiced from the audience near me were heard to the effect of "... tell them that..." and "...that's not what I hear...". If you view audits as a mandatory compliance obligation, you are probably not reinforcing an environment conducive to promoting the spirit of audits adding value.

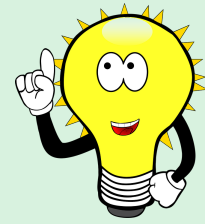
Be transparent, suggest work cells, processes or areas that have not been audited in previous audit cycles or have been the source of internal audit findings and actions taken. Auditors recognize the value of focusing their "snapshot in time" audit in conjunction with the limited time available for the elements being audited. Auditors are experienced to detect potential misdirection as well.

## **2025 AAR QUALITY ASSURANCE CONFERENCE HIGHLIGHTS**

By the RSI Newsletter Team

This year marked another successful and well attended Auditor's Conference in Phoenix, Arizona. Attendees were treated to a diverse group of presenters and topics. Workshops for welding and inspection of interior coatings were well received by the audience. The slido app utilized during the conference provided attendees the ability to ask questions and receive timely feedback. Additionally, attendees provided suggested conference topics for next year's event to be held at the Hilton St. Petersburg Bayfront hotel in Florida.

You can review the 2025 presentations using this link: [AAR Technical Services](#). Scroll to bottom of training page to locate 2025 and prior year's presentations.



### **Have an Idea for an Article?**

Please submit your drafts to Gary Alderson at [alderson@alltranstek.com](mailto:alderson@alltranstek.com) or Alfredo Ricardo at [ricardo@alltranstek.com](mailto:ricardo@alltranstek.com)

### **Interested in Joining RSI QAC?**

Contact Jeffrey Ostrander at [jostrander@rsiweb.org](mailto:jostrander@rsiweb.org)

### **Not Getting the Newsletter and Want to Subscribe?**

Contact Jeffrey Ostrander at [jostrander@rsiweb.org](mailto:jostrander@rsiweb.org)



During the conference the 2025 M-1003 mandatory elements were announced. The elements listed below will be included in all 2025 M-1003 audits:

- 2.4 Mgmt. Responsibility
- 2.6 Corrective and Preventive Actions
- 2.15 Process Control
- 2.22 Training

Also presented were the 2024 Top 10 M-1003 Findings:

- 2.7 Document Control
- 2.15 Process Control
- 2.8 Measuring and Testing Equipment
- 2.21 Internal Quality Audits
- 2.3 QA Program and Manual Requirements
- 2.6 Corrective and Preventive Actions
- 2.22 Training
- 2.19 Improvement and Change Management
- 2.5 Production, Inspection and Test Planning
- 2.16 Preservation, Packaging and Shipping

## 2025 AAR QUALITY ASSURANCE TRAINING SCHEDULE

Course	Date	Location
Basic Auditor Training Class	March 25-27	Puerto Vallarta, MX (Spanish)
	June 17-19	Guadalajara, MX (Spanish)
	July 15-17	Virginia Beach, VA
	September 16-18	Pueblo, CO
	November 4-6	Nashville, TN
Advanced Auditor Training Class	May 6-8, 2025	Greenville, SC
	August 19-21	Celaya, MX (Spanish)
	September 23-25	Lincoln, NE
	Sept. 30 – Oct. 2	Mira Loma, CA
	October 7-9	San Luis Potosi, MX (Spanish)

## USEFUL LINKS

[Railway Supply Institute](#)

[RSI QAC & Previous Newsletters](#)

[RSI Tank Car Resource Center](#)

[Registry of M-1003 Certified Companies](#)

[M-1003 Frequently Asked Questions](#)

[American Society for Quality - Training](#)

[RSI 100](#)

[AAR M-1003 Certification on-line Application](#)

[AAR M1003, Section J Specification for Quality Assurance](#)

[AAR Training Schedule](#)

[AAR Circulars](#)

[MSRP Publication Current Revision Status](#)

[AAR Online Material Nonconformance Reporting System \(Chapter 7\)](#)

[AAR FAQ Page includes QAPE](#)

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