



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

JUN 11 2015

Ms. Marie Easley-Cook
Hazardous Materials Administrator
Con-way Freight
2211 Old Earhart Road, Suite 100
Ann Arbor, MI 48105

Reference No. 15-0087

Dear Ms. Easley Cook:

This is in response to your letter dated April 27, 2015 regarding the shipper's certification prescribed in § 172.204 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether a shipper's certification may be signed using only the initials of the person certifying the shipment.

In accordance with 49 CFR Part 172 Subpart C, each person who offers a hazardous material for transportation must certify that the material is offered for transportation by printing (manually or mechanically) on the shipping paper the certification contained in § 172.204(a)(1) or the certification (declaration) containing the language in § 172.204(a)(2). Further, in accordance with § 172.204(d), the certification must be legibly signed by a principal, officer, partner, or employee of the shipper or his agent; and may be signed manually, by typewriter, or by other mechanical means. The HMR do not define the term signature; therefore, the signature requirement prescribed in § 172.204(d) may be satisfied by the use of initials provided the initials are traceable to the person certifying the hazardous materials for transportation.

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Duane Pfund
International Standards Coordinator
Standards and Rulemaking Division



Wrener
§ 172.204(d)
Shipper's Signature
15-0087

April 27, 2015

U.S. DOT
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, SE.
Washington, DC 20590-0001

RE: Request for interpretation letter

I am requesting formal clarification of the 172.204(d) signature requirement.

My question is about the use of initials as a signature. The only letter of interpretation referencing a person's initials in connection with 172.204(d) is Reference No. 05-0005. It appears to be acceptable.

Is it acceptable for a person certifying a hazardous material shipment to sign using their solely their initials?

The question was posed to the Hazardous Material Information Center on today's date. The answer was initials could be used as the shipper's certification signature. Please confirm.

Regards,

Marie Easley-Cook
Hazardous Materials Administrator
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