



U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

1200 New Jersey Ave, SE  
Washington, D.C. 20590

APR 22 2010

Mr. Christopher J. Widman  
ATK  
7480 Flying Cloud Drive  
Minneapolis, MN 55344

Ref. No. 10-0053

Dear Mr. Widman:

This responds to your March 3, 2010 request for clarification of requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180.) applicable to the shipper certification. Specifically, you ask for clarification of § 172.204(a)(1) and our interpretation (Ref. No. 06-0053, dated April 11, 2006) regarding using abbreviations in the certification statement.

In the letter you reference, we state: "The certification statement specified in § 172.204(a)(1) must be written as specified and may not be modified. Therefore, use of the abbreviation 'DOT' in lieu of 'Department of Transportation' in the shipper's certification statement is unacceptable." You note that the HMR define "DOT" to mean "the Department of Transportation" and ask why the abbreviation may not be used in the certification statement.

Section 172.204 requires a shipper to certify that a hazardous material is offered for transportation in accordance with the HMR using the certification statement in paragraph (a)(1) of that section. The certification is the shipper's legally binding statement of compliance. For clarity and consistency, the certification must appear on the shipping paper exactly as it appears in § 172.204(a)(1) or (a)(2). Use of the abbreviation "DOT" in lieu of "Department of Transportation" in the shipper's certification statement is unacceptable.

I hope this answers your inquiry. If you need additional assistance, please contact this Office.

Sincerely,

Charles E. Betts  
Chief, Standards Development  
Office of Hazardous Materials Standards



ATK  
7480 Flying Cloud Drive  
Minneapolis, MN 55344 -3720

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3 March 2010

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

Dear Standards:

Alliant Techsystems Inc. (ATK) is requesting an interpretation of 49 CFR §172.204 (1) Titled Shippers Certification & PHMSA Interpretation #06-0053; published on April 11<sup>th</sup> 2006.

ATK wishes to clarify your ruling that a shipper may not use the abbreviation DOT in the certification statement on a shipping paper.

Your #6-0053 interpretation states:

The certification statement specified in § 172.204(a) (1) must be written as specified and may not be modified. Therefore, use of the abbreviation "DOT" in lieu of "Department of Transportation" in the shipper's certification statement is unacceptable.

§171.8 Definitions

The HMR definition of DOT as currently contained in §171.8 is:

*DOT or Department* means U.S. Department of Transportation

Q1: Why does the HMR define DOT as Department of Transportation yet not authorize the use of the abbreviation DOT as part of the shippers' certification?

If you have any questions regarding the above request, please contact me at (952) 351-5506, or by email at [christopher.widman@atk.com](mailto:christopher.widman@atk.com).

Thank you for taking the time and resources to review.

Sincerely,

Christopher J. Widman  
Corporate DOT Haz Mat Transportation Specialist

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§172.204  
Shipping Papers  
10-0053