



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

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

AUG 11 2010

Mr. Cliff Bartley
Horizon Lines, LLC
Blount Island
5800-1 William Mills Street
Jacksonville, FL 32226

Ref. No.: 10-0140

Dear Mr. Bartley:

This responds to your June 30, 2010 letter requesting clarification of the requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping papers. Specifically, you ask if the shipping description for a hazardous material on a shipping paper may be hand-written in cursive writing. You provided an example of a basic description hand-written in cursive.

The HMR require the shipping description on a shipping paper to be legible and printed (manually or mechanically) in English (see § 172.201). There is no restriction on the use of cursive handwriting when creating a shipping paper, as long as the text is legible and meets the requirements of § 172.201. Please note that the legibility of handwritten basic descriptions can vary significantly due to human factors. As a result, some written descriptions may not satisfy the legibility requirements of the HMR. Therefore, we recommend that shipping descriptions are printed mechanically, whenever possible, to avoid unnecessary delays or compliance issues.

I hope this answers your inquiry. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Ben Supko".

Ben Supko
Acting Chief, Standards Development
Office of Hazardous Materials Standards

Tuesday, June 30, 2010

Mr. Ed Mazullo
Director, Office of Hazardous Materials Standards
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
East Building, 2nd Floor
Mail Stop: E21-317
1200 New Jersey Ave., SE
Washington, DC 20590

Dear Mr. Mazullo,

I am writing to your department to request a formal interpretation of 49CFR172.201(a)(2) as it pertains to the requirement that the hazardous material shipping paper be "legible and printed (manually or mechanically) in English".

I have a few customers who prepare their hazardous materials documentation on a printed form but the hazardous information is recorded in cursive writing. I have had a policy of accepting this type of documentation since the cursive writing is legible and clear. In passing the information on to other parties in the transportation chain, there have been some reservations to the documentation stating that it was not in "English". The parties stated that, "The other attachment is handwritten and in cursive so the USCG won't accept that".

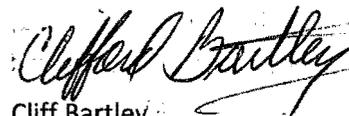
There does not seem to be a problem with the legibility of the text but the issue seems to be the cursive writing.

Please confirm that cursive English text is appropriate for the dangerous goods declaration. An example of the actual document is as follows.

1 Box Ethyl Alcohol Solutions, 3, UN1170, II, -17°C, 13 lbs

Thank you for your time attention to this matter.

Sincerely,



Cliff Bartley,
Horizon Lines, LLC
Manager Hazardous Materials