



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

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

MAY 03 2011

Mr. Roger W. Cooper
8412 Dutch Bethel Road
Freedom, In. 47431

Reference No.: 11-0079

Dear Mr. Cooper:

This responds to your March 30, 2011 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to placarding requirements. Specifically, you state in your letter that you have designed a placard holder utilizing a sheet of clear acrylic to protect the placards from damage. You ask whether your placard holder is permissible under the HMR so that you may produce this item for commercial sale.

This Office does not provide approval for commercial products. However, provided the placard itself meets the general specification requirements for placards specified in § 172.519, and the placard holder meets the dimensional specifications in Appendix C to Part 172 and does not prevent the placard from meeting the visibility and display requirements specified in § 172.516, the placard holder would be permitted to be used under the HMR.

I hope this satisfies your inquiry. Please contact us if we can be of further assistance

Sincerely,

A handwritten signature in cursive script that reads "T. Glenn Foster".

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Benedict
§ 172. Appendix C
§ 172.516 (7)(d)
Placarding
11-0078

March 30, 2011

Mr. Kurt Eichenlaub
Office of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
400 Seventh St, SW
Washington, DC 20590-0001
kurt.eichenlaub@dot.gov

Re: Design Example #1

Thank you for taking the time to talk with me on March 28, 2011 at 10:15am in regards to the dimensions of the placard holder. What we talked about was the design of the placard holder. I do not want to change the size or shape, I want to improve it. The placards don't stay in the holder, they fly out. The cardboard placards work better until they get wet and then they soften up and fly out. The vinyl placards are hard to keep in the holder as well. So, what I came up with is a design that incorporates a sheet of clear acrylic that is approved by Motor Vehicle Safety Standards ANSI Z26.1. With this product placed at the front of the placard holder and held in place the placards should not fly out. This would save trucking company's money because they can reuse the placards and drivers would not have to keep extras on the truck to replace the ones that fly out while in route to their destination. It would cut down on the litter on the highways. It would take stress off of the drivers as they are the ones that are ticketed for missing placards. When a driver rolls up in the scale house or for DOT inspection they won't have to worry about what placard flew off.

It is a simple design change of adding a sheet of clear acrylic cut to fit in the original, already approved placard holder. The dimensions would be 10 3/4" X 10 1/2" and it would fit perfectly in the original placard holder.

Attached are pictures of before and after and you can see there are no significant changes between the size of the two. There will be enough clearance between the frame and the glass that it shouldn't hold any water.

I sincerely hope that you will take a good hard look at this. It is a step that needs to be taken to eliminate the problem of placards coming out while in route.

What I am asking for is a letter of approval so I can go forward with this design.

If you need more information or specifications, please feel free to contact me by e-mail sheilacooper@hughes.net or my cell number 317-372-4472.

Thank you again for your time.

Respectfully,

Roger W. Cooper
8412 Dutch Bethel Road
Freedom, Indiana 47431
317-372-4472 cell