



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

1200 New Jersey Avenue, SE
Washington, DC 20590

Mr. Marvin Sudduth
FedEx Express
3670 Hacks Cross Rd.
Building G, 2nd Floor
Memphis, TN 38125

MAR 17 2015

Reference No. 14-0227

Dear Mr. Sudduth:

This is in response to your November 18, 2014 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding rounding hazardous materials quantity totals on shipping papers. You note that your company is working on a customer automation platform that will assist in generating shipping papers for both air and ground transportation. You further note that the system supports net and gross weight to the hundredths (two decimal places) and that customers would be required to round up the net or gross weight to two decimal places. You state that FedEx believes that rounding hazmat quantity totals to two decimal places is compliant with § 172.202(a)(5) and (6), and seek PHMSA's confirmation of the same.

Neither § 172.202(a)(5) or (6) provide an allowance for shippers to round up either the net or gross quantity of a hazardous material being offered. However, it is the opinion of this office that providing quantities to the second decimal place, when rounded up to 0.01 for quantities less than 0.01 provides sufficient notification of the minute quantity of hazardous material being offered for transportation in a package or consignment. Such a practice would be in compliance with § 172.202(a)(5) and (6).

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

Sincerely,

A handwritten signature in black ink, appearing to read "Shane C. Kelley".

Shane C. Kelley
Acting International Standards Coordinator
Standards and Rulemaking Division



November 18, 2014

Mr. Charles E. Betts
Director
Standards and Rulemaking Division
U.S. DOT/PHMSA (PHH-10)
1200 New Jersey Avenue, SE East Building, 2nd Floor
Washington, DC 20590

Webb
§ 172.202(a)(5)(6)
Shipping Papers
14-0227

Re: Request for Letter of Interpretation Regarding Rounding of Hazmat Quantity Totals On a Shipping Paper

Dear Mr. Betts:

The purpose of this communication is to request a Letter of Interpretation regarding the listing of rounded hazardous materials quantity totals on a hazmat shipping paper. The regulatory reference that is affected by this question is 49 CFR 172.202 (a)(5) and (6). We were not able to find any guidance in the regulations or through any previous PHMSA interpretation regarding the specificity required for the net or gross weight on a shipping paper.

FedEx is working with customers in developing a customer automation platform that will assist in generating shipping papers for both air and ground transportation. The platform supports net and gross weight specificity to the hundredths (two decimal places) and customers would be required to round up net or gross weight to two decimal places.

Example: 0.002L would be rounded to 0.01L or 0.002kg would be rounded up to 0.01kg

We understand that the intent of the regulatory guidance communicated in 49 CFR 172.202 (a)(5) and (6) is for the shipper to accurately and completely communicate the net or gross quantity of a hazmat commodity packaged into a single container on a shipping paper.

FedEx believes that rounding hazmat quantity totals to two decimal places is compliant with the intent of 49 CFR 172.202 (a)(5) and (6) and is seeking PHMSA's confirmation of the same.

I look forward to your response. Should you have any questions or require additional information please do not hesitate to contact me.

Sincerely,

Marvin Sudduth
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Dangerous Goods Administration
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