



U.S. Department
of Transportation

1200 New Jersey Avenue SE
Washington, DC 20590

**Pipeline and Hazardous
Materials Safety
Administration**

FEB 25 2015

Mr. Cliff Croft
Kajuligan Inc.
1533 Kirkwood Drive
Geneva, IL 60134

Reference No. 14-0245

Dear Mr. Croft:

This is in response to your December 22, 2014 e-mail requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relating to the emergency response telephone number requirements of HMR § 172.604(a). You ask for confirmation of your understanding that if the emergency response telephone number is located in the United States, it does not have to include the "+" (plus) sign, country code and city code, as appropriate, even if the shipment is intended to be transported internationally by air.

Your understanding is correct. In accordance with § 172.604(a) an emergency response telephone number located within the United States only requires the telephone number and area code. The "+" (plus) sign, country code and city code, as appropriate, must only be included if the telephone number is outside the United States.

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

Sincerely,

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division

Balsich
§172.604(a)
Emergency Response
14-02450

Dodd, Alice (PHMSA)

From: Ciccarone, Michael CTR (PHMSA)
Sent: Monday, December 22, 2014 3:49 PM
To: Hazmat Interps
Subject: FW: Request for formal interpretation for 49CFR 172.604(a)

Shante/Alice,

Please submit this for a formal letter of interpretation. Mr. Croft spoke with Jordan in the HMIC.

Thanks,

Mike

From: Cliff Croft [mailto:cliff.e.croft@gmail.com]
Sent: Monday, December 22, 2014 3:37 PM
To: Ciccarone, Michael CTR (PHMSA)
Subject: Re: Request for formal interpretation for 49CFR 172.604(a)

The Company address is
Kajuligan Inc.
1533 Kirkwood Dr
Geneva, IL 60134

On Mon, Dec 22, 2014 at 2:30 PM, <m.ciccarone.ctr@dot.gov> wrote:

Dear Cliff,

We have received your request for a written letter of interpretation regarding the hazardous materials regulations (49 CFR Parts 171-180).

Please include your company's physical address to expedite the submission process.

Sincerely,

Mike, Hazardous Materials Specialist

An e-mail response from this office is considered informal guidance. Formal guidance may be requested in accordance with 49 CFR 105.20. <http://phmsa.dot.gov/hazmat/regs/interps>

From: Cliff Croft [mailto:cliff.e.croft@gmail.com]
Sent: Monday, December 22, 2014 2:33 PM
To: PHMSA HM InfoCenter
Subject: Request for formal interpretation for 49CFR 172.604(a)

I would like to get a formal written interpretation for 172.604(a) with regard to the international access code. If we are making an International shipment utilizing an emergency phone number located in the united states are we required to include the international access code or "+" sign and country code? The way the rule is written it appears to be based on where the telephone number is located and not where the shipment originates or its destination. So it is my understanding if a company is using Chemtrec 703-245-2380 on an air declaration for an international shipment the "+" and country code is not required since the phone number originates within the United States.

Thank you,

Cliff Croft

Kajuligan Inc.