U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

SEP 23 2004

The Honorable Ellen Engleman Conners
Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

Dear Chairman Engleman Conners:

This is the Research and Special Programs Administration's (RSPA) initial response to the National Transportation Safety Board (NTSB) Safety Recommendations P-04-01, P-04-02, and P-04-03, which resulted from a July 4, 2002, accident in Cohasset, Minnesota.

By the end of 2004, RSPA expects to publish a notice in the Federal Register to seek additional information on the removal of the exemption described in NTSB Safety Recommendation P-04-01. The notice will request public comment on the issues raised by a possible rule to remove the exemption and to determine whether expanded testing of pipe might provide an adequate alternative. RSPA will also review and consider information on vintage pipe and fatigue issues for natural gas transmission lines in reports being prepared by the Interstate Natural Gas Association of America (INGAA).

In response to NTSB Safety Recommendation P-04-02, RSPA will soon publish a notice to seek information on how incorporation by reference of American Petroleum Institute's Recommended Practice 5LW (API RP 5LW) for transportation of pipe on marine vessels would impact gas and hazardous liquid pipeline operators.

In response to NTSB Safety Recommendation P-04-03, RSPA will conduct a literature search and a comparison of U.S. standards with international standards for truck transportation of pipe. If this research indicates that a standard for truck transportation is warranted, we will approach a standards-developing organization to develop a voluntary consensus standard. This data collection effort will help to define the scope of a possible regulatory action in 2005 on the transportation of pipe by truck.

RSPA requests that NTSB Safety Recommendations P-04-01, P-04-02, and P-04-03 be classified as "OPEN - Acceptable Response" while we pursue the actions described in the enclosures.

If we can be of further assistance, please contact me or James Wiggins, Director of Policy and Program Support, at (202) 366-4831.

Sincerely yours,

Samuel G. Bonasso
Deputy Administrator

Enclosures

cc: Robert Chipkevich, NTSB
Rod Dyck, NTSB