



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

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

**JUN 02 2010**

Mr. David Littlejohn  
 FedEx Express Corporation  
 3670 Hack Cross Road  
 Building G, 2nd Floor  
 Memphis, TN 38125-8800

Reference No. 10-0068

Dear Mr. Littlejohn:

This is in response to your e-mail and telephone conversation with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding shipping paper formatting of identification number entries. Specifically, you asked whether a UN identification number, for example, UN1263, may be split into two lines in the identification number column on shipping papers.

You provided the following example:

NATURE AND QUANTITY OF DANGEROUS GOODS				
Dangerous Goods Identification				Quantity and type of packaging
UN or ID No.	Proper Shipping Name	Class or Division (Subsidiary Risk)	Packaging Group	
UN3 268	AIR BAG MODULE	9	III	

We recommend that the designated column be of sufficient width to accommodate the identification number on a single line. However, the identification number may be entered on two lines, split between any of the numerals, when placed in a column captioned to clearly identify the contents and the entry is easy to read and not run together with other text or numerals. The entry shown in the above example is acceptable.

I hope this information is helpful. Please contact this office if you have additional questions.

Sincerely,

Hattie L. Mitchell  
 Chief, Regulatory Review and Reinvention  
 Office of Hazardous Materials Standards

**Drakeford, Carolyn (PHMSA)**

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**From:** Betts, Charles (PHMSA)  
**Sent:** Monday, March 22, 2010 11:57 AM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: PHMSA Interpretation

**Importance:** High

McIntyre  
\$172.204  
Shipping Papers  
10-0068

CAROLYN,

HERE IS ANOTHER NEW REQUEST FROM FEDEX.

THANKS,  
CHARLES

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**From:** David Littlejohn [mailto:mdlittlejohn@fedex.com]  
**Sent:** Monday, March 22, 2010 11:36 AM  
**To:** Betts, Charles (PHMSA)  
**Subject:** PHMSA Interpretation  
**Importance:** High

Dear Mr. Betts:

FedEx Express is requesting your office provide an interpretation regarding information noted on a Dangerous Goods (DG) Shipper's Declaration. As you are aware many shippers utilize a standard format where the paperwork has headings or columns for the information to be noted. At times because of space a shipper may not be able to include all of the information under the column. For example the UN/ID number. A shipper that may be offering UN 1263 lists the number as UN12 with the 63 directly underneath. It is our position this would be permissible certainly when this information is being noted on a standard form directly under a heading/column. Thank you in advance for providing a response and if any additional information is needed please do not hesitate to contact me directly.

Regards,

David Littlejohn  
FedEx Express Corporation  
Corporate Safety Advisor  
901-434-9567