
From: Joshua Brown (DHL US) <joshua.brown6@dhl.com>

Sent: Friday, April 25, 2025 4:46 PM

To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>

Subject: RE: Request for Clarification on Regulations in CFR 49 175.26 freight forwarders

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Hello, after speaking to the hotline team, I would like to ask for an official clarification. After reading both 17-0004 , 05-0223 the rep on the phone requested I ask for an official letter.

My home address is 20215 e. 9th ct Spokane Valley WA. 99016
Personal phone number 415 279 1567

If you need a professional address, please let me know and I can provide one. I work remotely so mailing something to one of our offices, I probably would not receive.

Thank
Josh

From: Joshua Brown (DHL US)

Sent: Thursday, April 17, 2025 14:46

To: phmsa.hm-infocenter@dot.gov

Cc: Joshua Brown (DHL US) <joshua.brown6@dhl.com>

Subject: Request for Clarification on Regulations in CFR 49 175.26 freight forwarders

Request for Interpretation

To whom it may concern,

I am reaching out to seek clarification regarding the regulations outlined in CFR 49 175.26. Specifically, I would like to understand the requirements for displaying notices for individuals involved in the acceptance or transport of cargo for transportation by aircraft.

Background

As a freight forwarding business “DHL Global Forwarding US”, our operations primarily revolve around coordinating the movement of freight between shippers and air or ocean carriers. While the freight we handle may eventually be shipped by plane, our processes do not involve loading aircraft or vessels, nor do we engage in packing, repacking, or completing shipping paperwork for shipments. Although we may operate offices and warehouses that may be within the confines of some airports, we also operate offices and warehouses that are not on airport property. At any time, any one of our inbound or outbound shipments at any location may be destined for air, ocean, or domestic ground transport or some combination of the three. I would also like to clarify, we do not except “walkup” or “drop-off” of shipments like that of a US post office or a private shipping desk meant for small parcel or general public nor are our “offices” accessible or approachable by the general public. We coordinate with the offeror to pickup/deliver via truck to one of our physical locations or we bypass our locations and deliver directly to the long-haul shipper (ocean or air).

Our shipments are pre-booked and coordinated before being shipped to/through our locations. We as the forwarders choose when and if freight will be passing through our locations physically. We are in that respect mostly a cross docking and sometimes consolidating (meaning sit in our facility and wait until we have enough freight to fill up a delivery to a carrier) organization. We do not store shipments for customers as a service, although shipments may be in facilities for longer periods of time based on certain scenarios regarding the end-to-end process of shipping freight.

Given this context, I would appreciate your guidance on how the regulation of CFR 49 175.26 may apply to our organization, considering our role in the coordination of freight movement rather than direct acceptances from the general public.

- The scope and applicability of the regulations outlined in CFR 49 175.26 as it pertains to

freight forwarders who do not load or pack DG but only coordinate and cross dock DG freight in transit to the ultimate carrier with no general public or ad-hoc freight drop off processes.

- If 175.26 does pertain to freight forwarders with our situation, must the signs be posted in areas/locations that do not handle physical freight but only coordinate the possible transport of air cargo such as offices, and remote offices.

Thank you for your attention to this matter. Your expertise and clarification will assist us in ensuring compliance with the relevant regulations.

Joshua Brown

Sr. Manager, Dangerous Goods Compliance
973.848.7308

DHL Global Forwarding

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