

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#); [Baker, Yul \(PHMSA\)](#)
Subject: FW: Interpretation Request - Shipping Cat B Blood as Non-Regulated for Autologous Transfusion
Date: Monday, April 21, 2025 15:42:04
Attachments: [PHMSA Interpretation Request Autologous Transfusion.pdf](#)

Hi Alice,

Please see the attached interpretation request. Let us know if you need anything.

Sincerely,
Janaye

From: Jim Powell <jim@dgtraining.com>
Sent: Monday, April 21, 2025 1:43 AM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>; INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Jim Powell <jim@dgtraining.com>; Terry Poland <Terry@dgtraining.com>
Subject: Interpretation Request - Shipping Cat B Blood as Non-Regulated for Autologous Transfusion

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Please see the attached request to clarify 173.134(b)(7) which essentially exempts all blood being shipped for the purpose of transfusion, from the HMR. It is possible that a patient with a rare blood type might want to bank their own blood for a future surgery. If that patient tested positive for HIV or Hepatitis or some other blood borne pathogen, could this blood, being shipped for transfusion be shipped as non-regulated.

It seems that it could. It's not being shipped for the purpose of testing – it's already been tested so 173.134(b)(8) would not seem to apply.

I called the HMinfo center and talked with an agent so agreed that it would be not subject to the HMR but I'd feel more comfortable with an interpretation.

Thank you,

Jim Powell
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