

**From:** Aneta Eames <auburnoilservices@gmail.com>  
**Sent:** Wednesday, June 18, 2025 3:50 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Letter of interpretation request

I am the owner-operator of Rocket Services LLC, USDOT #4200285, a Massachusetts-based company located at 6 Stone Ridge Drive, Leicester, MA 01524. My company operates exclusively within the Commonwealth of Massachusetts, delivering #2 heating oil, a Class 3 Flammable Liquid (NA 1993), using two trucks with 2,800-gallon cargo tanks, which require placarding pursuant to 49 CFR 172.500. Rocket Services LLC employs no additional personnel, never crosses state borders, and does not offer hazardous materials for interstate or foreign transportation.

I seek formal clarification regarding the applicability of the Hazardous Materials Certificate of Registration requirement under 49 CFR 107.601, which states: "This subpart applies to any person who ... offers for transportation, or transports, in foreign, interstate or intrastate commerce ... a hazardous material ... for which placarding of a vehicle ... is required under subpart F of part 172 of this subchapter ..." (49 CFR 107.601(a)(6)). While the regulation includes "intrastate commerce," PHMSA guidance and interpretive materials (e.g., PHMSA FAQs at [www.phmsa.dot.gov/hazmat/registration](http://www.phmsa.dot.gov/hazmat/registration)) clearly prioritize application of the registration requirement to carriers engaged in interstate or foreign commerce, or to intrastate carriers who also offer hazardous materials for interstate transportation. As Rocket Services LLC operates solely and exclusively intrastate, with no involvement in interstate or foreign commerce, I submit that my company is exempt from the federal registration requirement and its associated fee under 49 CFR 107.612.

Last year, Rocket Services LLC registered and paid the registration fee. We are a small local family business and we want to make sure we don't pay unnecessary fees.

Please provide a written response referencing USDOT #4200285 to ensure compliance certainty. Thank you for your prompt attention to this matter.

Respectfully,

**Aneta Eames**

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