
From: Melissa Owens <melissa.mcpherson@fedex.com>
Sent: Tuesday, July 15, 2025 4:49 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Interpretation Letter Request

You don't often get email from melissa.mcpherson@fedex.com. [Learn why this is important](#)

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Hazardous Materials Information Center,

I am attaching a letter to request an interpretation of shipping paperwork. If you need any additional information or have any questions, please contact me via email or the phone number below.

Regards,

Melissa Owens (she, her, hers) | HazMat & Accident Specialist | FedEx Custom Critical | Safety Department | 234.310.4311 | 4205 Highlander Parkway, Richfield, OH 44286 | email 1446133@fedex.com

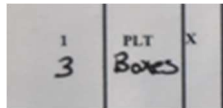
07/15/2025

Mr. Shane Kelley
Director, Standards and Rulemaking Division
U.S. DOT / PHHMA (PHH-10)
1200 New Jersey Ave, SE East Building, 2nd Floor
Washington, DC 20590

Dear Mr. Kelley:

While your office has provided guidance regarding quantity and package type requirements on shipping documents created with the Commercial Bill of Lading (CBL) system, we are requesting additional guidance regarding the use of Commercial Bill of Lading Correction Notices (Correction Notices).

Based on our own interpretation and your previous guidance, we have continued to ask for the quantity and package type to be added to the CBL, providing Interpretation Letter 23-0094 as a supporting document if needed. In most cases the customers have been manually entering the information on the shipping document, as shown in the example below.



Other customers have refused to write the quantity and package type on the CBL and instead provided a Correction Notice as a supplement to their existing CBL. The CBL and its continuation sheets are properly marked as required by 172.201(c); however, the Correction Notices are stand-alone documents and not included as continuation pages of the shipping document. I have attached a redacted copy of a CBL and accompanying Correction Notice for your reference.

In instances when a Correction Notice has been supplied in lieu of updating the original CBL, we have declined the shipments. It is our interpretation that since the shipping document and its continuation pages do not meet the requirements of 172.202(a)(7), accepting it would be a violation. The customers have insisted that the Correction Notice coupled with the existing, unchanged CBL meets those requirements.

Regards,

Melissa Owens
HazMat & Accident Specialist, Safety Department

COMMERCIAL BILL OF LADING				DATE 2025-07-14		ORIGINAL B/L NO. > [REDACTED]	
CARRIER FedEx Custom Critical				SCAC FDCC		CARRIER ACCOUNT NO.	
DESTINATION (Name, address and ZIP code) [REDACTED]				ORIGIN (Name, address and ZIP code) [REDACTED]		SPLC (Dest.) [REDACTED]	
SPLC (Dest.) [REDACTED]				SPLC (Orig.) [REDACTED]			
CONSIGNEE (Name, address and ZIP code of installation) [REDACTED]				SHIPPER (Name, address and ZIP code) [REDACTED]			
APPROPRIATION CHARGEABLE SEE DESCRIPTION OF ARTICLES				BILL CHARGES TO (Dept/agency, bureau/office mailing address and ZIP code) PowerTrack, U.S. Bank EP-MN-L27C 200 South Sixth Street Minneapolis, MN 55402 FWTRTK			
VIA (Route shipment when advantageous to the Government)							
MARKS AND ANNOTATIONS [4] E039174608 DDP Dual Driver SNS Satellite Motor Surveillance Dock loading requirements are for an AO3 or AO4, only				supplement allowed would be an AV for loading purposes at loading facility. Installation Entry Instructions: [REDACTED] TF: 3 DD:2025-07-22 S039174607			
TOTAL PKGS. NO KIND HM				DESCRIPTION OF ARTICLES (Use carrier's classification or tariff description if possible; otherwise use clear nontechnical description)			
CLASSIFICATION ITEM NO 06430004 MISSILES OR ROCKETS, GUIDED WITH WARHEADS, CLASS 1, DIVISIONS 1.				Page 1 of 4			
Mileage 818 TOT QTY: 6004 LB CU: 149 NEW 899.869 LB				6004.0 LB			
IN CASE OF EMERGENCY CALL FOR EXPLOSIVES: 703-695-4695/4696 FOR OTHER HAZMAT: 800-851-8061							
TARIFF/SPECIAL RATE AUTHORITY FDCC:006664-00				PICKUP SERVICE FURNISHED VEHICLE FULLY LOADED		SHIPPER'S INITIALS LDA	
STOP SHIPMENT AT				FURNISH INFORMATION ON CAR/TRUCKLOAD/CONTAINER SHIPMENTS			
INITIALS & NO.				SEAL NUMBERS		LENGTH/CUBE	
FDCC:D10254				APPLIED BY SH		ORDERED AO4	
CARRIER'S PICKUP DATE 2025-07-14				SIGNATURE OF AGENT William & Rosa Dean		PER FDCC	
MODE LT				ESTIMATE 3,699.30		NO CLS/TLS 1	
TYPE RATE PSC				REASON DDP: SNS		DELIVERED ON DATE	
ISSUING OFFICER AND OFFICE (Issuing officer name, office and complete address) [REDACTED]				BY (Name of the delivering carrier) [REDACTED]			
CONTRACT/PURCHASE ORDER NO. AND FOB POINT				DATED		GBLOC [REDACTED]	
THIS IS TO CERTIFY THAT HEREIN NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION, SUBJECT TO SECTION 7 OF THE CONDITIONS, IF THIS SHIPMENT IS TO BE DELIVERED TO THE CONSIGNEE WITHOUT RECOURSE ON THE CONSIGNOR, THE CONSIGNOR SHALL SIGN THE FOLLOWING STATEMENT: THE CARRIER SHALL NOT MAKE DELIVERY OF THIS SHIPMENT WITHOUT PAYMENT OF FREIGHT AND ALL OTHER LAWFUL CHARGES.				DELIVERED THIS CONSIGNMENT COMPLETE & IN APPARENT GOOD ORDER EXCEPT AS MAY BE INDICATED <input type="checkbox"/> CARRIER OSAD REPORT ATTACHED <input type="checkbox"/> DELIVERY AT DESTINATION FURNISHED <input type="checkbox"/> ACCESSORIAL SERVICES CERTIFICATION ATTACHED			
RECEIVED, SUBJECT TO THE TENDERS AND RULES IN EFFECT ON THE DATE OF THE ISSUE OF THIS BILL OF LADING, THE PROPERTY DESCRIBED ABOVE IN APPARENT GOOD ORDER, EXCEPT AS NOTED (CONTENTS AND CONDITIONS OF CONTENTS OF PACKAGES UNKNOWN), MARKED, CONSIGNED, AND DESTINED AS INDICATED ABOVE WHICH SAID CARRIER (THE WORD CARRIER BEING UNDERSTOOD THROUGHOUT THIS CONTRACT AS MEANING ANY PERSON OR CORPORATION IN POSSESSION OF THE PROPERTY UNDER THE CONTRACT) AGREES TO CARRY TO ITS USUAL PLACE OF DELIVERY AT SAID DESTINATION, IF ON ITS ROUTE, OTHERWISE TO DELIVER TO ANOTHER CARRIER ON THE ROUTE TO SAID DESTINATION, IT IS MUTUALLY AGREED AS TO EACH PARTY AT ANY TIME INTERESTED IN ALL OR ANY SAID PROPERTY, THAT EVERY SERVICE BE PERFORMED HERE UNDER SHALL BE SUBJECT TO ALL THE BILL OF LADING TERM AND CONDITIONS IN THE GOVERNING CLASSIFICATION ON THE DATE OF THE SAID TERMS AND CONDITIONS ARE HEREBY AGREED BY THE SHIPPER AND ACCEPTED FOR HIMSELF AND HIS ASSIGNS. NOTE - WHERE THE RATE IS DEPENDENT ON VALUE, SHIPPERS ARE REQUESTED TO STATE SPECIFICALLY IN WRITING THE AGREED OR DECLARED VALUE OF THE PROPERTY. THE AGREED OR DECLARED VALUE OF THE PROPERTY IS HEREBY SPECIFICALLY STATED BY THE SHIPPER TO BE NOT EXCEEDING: \$ _____ PER _____ FREIGHT CHARGES PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/> FREIGHT PREPAID UNLESS COLLECT BOX IS CHECKED				NAME OF BILLING CARRIER [REDACTED]			
						SIGNATURE OF AGENT [REDACTED]	

COMMERCIAL BILL OF LADING CONTINUATION SHEET

ORIGINAL

B/L
NO. > [REDACTED]

SHEET NO. 2 OF 4

(This form is to be used as a continuation sheet for SF 1105, US,
Government Freight Waybill-Original, or SF 1205, U.S. Government
Freight Waybill-Privately Owned Personal Property- Original.)

ISSUING OFFICE (Name and complete address)

[REDACTED]

TRANSPORTATION COMPANY TENDERED TO
FedEx Custom Critical

FROM (Shipping Point)

WAYBILL DATE

WAYBILL NUMBER

PACKAGES		HM	DESCRIPTION OF ARTICLES (Use carrier's classification or tariff description if possible; otherwise use a clear nontechnical description.)	QUANTITY * (Pounds, Gallons or Barrels)	FOR USE OF BILLING CARRIER ONLY		
NO	KIND				SERVICES	RATE	CHARGES
1	PLT	X	UN0186, ROCKET MOTORS, 1JC FLASHPOINT:0 TOT HAZ QTY: 1357.0 LB (615.535 KG) NET EXP WEIGHT: 512.352 LB (232.399 KG) DODIC: 11A07 NSN: 1340-01 424-5819 ROUND CNT:72 MISSILES OR ROCKETS, GUIDED WITH WARHEADS, CLASS 1, DIVISIONS 1. TCN:V0916751648357XXX CU:43.0 COMMODITY:06430004 APPRO: NNAQ EXPLOSIVES AMMO SUB 4 1 PT CU:43.0 49L41W3711 1457.0LB	1,457.0 LB			
2	PCS	X	UN0430, ARTICLES, PYROTECHNIC, 1JG FLASHPOINT:0 TOT HAZ QTY: 112.0 LB (50.803 KG) NET EXP WEIGHT: 14.298 LB (6.485 KG) DODIC: L601 NSN:1370-01-614-5083 ROUND CNT:300 AMMUNITION, EXPLOSIVES, FIREWORKS, OR CHEMICAL MUNITIONS, NOIBN/ TCN:FV483050970182XXX CU:6.0 COMMODITY:06430002 APPRO: F8UT EXPLOSIVES AMMO SUB 2 2 PC CU:6.0 23L13W1611 112.0LB	112.0 LB			
3	PLT	X	UN0339, CARTRIDGES, SMALL ARMS, L4C FLASHPOINT:0 TOT HAZ QTY: 4335.0 LB (1,966.356 KG) NET EXP WEIGHT: 373.219 LB (169.289 KG) DODIC: A555 NSN:1305-01-658-2714 ROUND CNT:1000 AMMUNITION, EXPLOSIVES, FIREWORKS, OR CHEMICAL MUNITIONS, NOIBN/ TCN:FV483051601549X2X CU:100.0 COMMODITY:06430003 APPRO: F8UT EXPLOSIVES AMMO SUB 3 2 PT CU:100.0 52L44W3811 4435.0LB	4,435.0 LB			
			THIS IS TO CERTIFY THAT THE HEREIN- NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED & LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION SIGNED.....ERIC M OVER				

COMMERCIAL BILL OF LADING CONTINUATION SHEET

ORIGINAL

B/L
NO. > [REDACTED]

SHEET NO. 3 OF 4

(This form is to be used as a continuation sheet for SF 1105, U.S. Government Freight Waybill-Original, or SF 1205, U.S. Government Freight Waybill-Privately Owned Personal Property- Original.)

ISSUING OFFICE (Name and complete address)

[REDACTED]

TRANSPORTATION COMPANY TENDERED TO
FedEx Custom Critical

FROM (Shipping Point)

WAYBILL DATE

WAYBILL NUMBER

PACKAGES		HM	DESCRIPTION OF ARTICLES (Use carrier's classification or tariff description if possible; otherwise use a clear nontechnical description.)	QUANTITY * (Pounds, Gallons or Barrels)	FOR USE OF BILLING CARRIER ONLY		
NO	KIND				SERVICES	RATE	CHARGES
			<p>DATE.....:7-14-2025 EMERGENCY CONTACT:JOSHUA EATON EMERGENCY PHONE...:7172678800</p> <p>MARKS AND ANNOTATIONS:</p> <p>cargo to enter via the Main Gate. Special BL Annotations Recommended for Driver Instructions: AAE Shipments 0730-1500 M-F-EH POC NATHAN LUKE PHONE 229-257-4125 (229)257-3158 or 3287 or 1309 or 1338 or 3051. RECEIVING HOURS: 0730-1500 MONDAY THRU FRIDAY, EXCLUDING HOLIDAYS. Installation Entry Instructions:</p> <p>[REDACTED]</p> <p>In-transit emergency contact information: (1) DOD general hazardous (excludes Explosive and Radioactive) material shipments contact DLA hotline, 800-851-8061 (2) Ammunition and Explosive (Class I) shipments, contact Army Operations Center (AOC) 703-695-4695/4696 DSN 225; ask for Watch Officer (3) Radioactive material (Class 7), contact shipment sponsor's hotline: (Army 703-695-4695/4696 DSN 225; USAF 202-767-4011; DLA 800-851-8061; at sea 804-279-3131) (4) DOD Chem/Bio Warfare Material contact 20th CBRNE Command 410-436-6200 (5) DOD Secure Holding contact DTTS 800-826-0794 (104) Dual driver protective service (DDP) requested. One driver must possess an interim or final SECRET clearance and the second driver will have submitted an E-QIP through DSS and not have been previously denied a final clearance. Signature and Tally Record (DD form 1907) furnished to carrier. (105) Use of Signature and Tally Record requested. DD Form 1907 furnished to carrier. (110) Loading performed by SHIPPER; unloading performed by SHIPPER (111) Shipper to load and consignee to unload. (112) Flame or heat producing tools will not be used to remove security devices. (114) "Carrier to notify AT OR, OR AT OR immediately if shipment is delayed en route because of an accident or incident. If neither can be reached, contact DTTS hotline at (800) 826-0794. Use hotline number to obtain safe haven or refuge instructions in the event of a civil disorder, natural disaster, carrier strike or other emergency." (116) Released value not exceeding \$2.50 per pound." (120) Shipper seal(s) applied. Carrier may remove seal(s) and replace with equivalent seal(s) on prior consent of consignor. If seals are broken in</p>				

COMMERCIAL BILL OF LADING CONTINUATION SHEET

(This form is to be used as a continuation sheet for SF 1105, US, Government Freight Waybill-Original, or SF 1205, U.S. Government Freight Waybill-Privately Owned Personal Property- Original.)

ORIGINAL

B/L
NO. > [REDACTED]

SHEET NO. 4 OF 4

ISSUING OFFICE (Name and complete address)

[REDACTED]

TRANSPORTATION COMPANY TENDERED TO
FedEx Custom Critical

FROM (Shipping Point)

WAYBILL DATE

WAYBILL NUMBER

PACKAGES		HM	DESCRIPTION OF ARTICLES (Use carrier's classification or tariff description if possible; otherwise use a clear nontechnical description.)	QUANTITY * (Pounds, Gallons or Barrels)	FOR USE OF BILLING CARRIER ONLY		
NO	KIND				SERVICES	RATE	CHARGES
			<p>emergencies, notify consignor at or as soon as possible. Carrier must annotate seal changes on BL. Application of shipper seal(s) does not constitute a request for exclusive use of vehicle.</p> <p>(314) Annotate BL: "Emergency response information for this motor shipment is indexed by UN number and is located in the Department of Transportation Emergency Response Guidebook (DOT ERG current version)."</p> <p>(337) Satellite motor surveillance service (SNS) requested. In event of system failure, driver must immediately notify the motor carriers dispatcher who will immediately notify DTTS at 1- (800) 826-0794. The driver must subsequently provide DTTS a telephonic location/status report every two hours, with a final telephonic report upon delivery at destination.</p> <p>(367) This shipment must not be transported in trip-leased equipment.</p> <p>405 - Fuel Related Rate Adjustment PW \$ 286.30</p> <p>THIS IS A DTTS SHIPMENT</p> <p>APPROPRIATION SUBTOTALS:</p> <p>NNAQ Finance Payment Office Code: W53QRD INDIANAPOLIS CENTER INDIANAPOLIS, IN 462490611 US WEIGHT -> COST -></p> <p>F8UT Finance Payment Office Code: W53QRD INDIANAPOLIS CENTER INDIANAPOLIS, IN 462490611 US WEIGHT -> COST -></p> <p>EQUIPMENT DESCRIPTION CONT:</p> <p>TRACTOR: D10254 TOTAL NET EXPLOSIVE WEIGHT -> Total Quantity 6,904.0LB Total Cost 3,699.30</p>	<p>1,457.00 LB 897.71</p> <p>4,547.00 LB 2,801.59</p> <p>899.869 LB</p>			

COMMERCIAL BILL OF LADING CORRECTION NOTICE		DATE NOTICE PREPARED 2025-07-14
1. CBL NUMBER [REDACTED]	2. DATE CBL WAS ISSUED 2025-07-14	3. TOTAL QUANTITY SHOWN ON CBL 6004LB
4. ORIGIN (As shown in "Origin" block on CBL) [REDACTED]	5. DESTINATION (As shown in "Destination" block on CBL) [REDACTED]	
6. ROUTE (Complete routing shown on CBL)	7. ISSUING OFFICE (As shown on CBL under "For Use of Issuing Office") [REDACTED]	
8. To: (Name and address of carrier/activity to which directed, including ZIP Code) [REDACTED]		9. Complete items 9a, b, c only when correction is made after transportation charges have been paid.
		a. D.O. VOUCHER NUMBER
		b. D.O. VOUCHER DATE
		c. D.O. SYMBOL
10. FROM: (FULL name and address of the activity initiating the notice, including ZIP Code.) [REDACTED]		
11. BILL OF LADING NOW READS (Show the information as it reads prior to correction) ***** REASON ***** ***** DESCRIPTION OF ARTICLES DETAIL ***** EQUIPMENT 1 2, PLT, X, UN0339, CARTRIDGES, SMALL ARMS, 14C, 4,435.0 LB FLASHPOINT:0 TOT HAZ QTY: 4335.0 LB (1,966.356 KG) NET EXP WEIGHT: 373.219 LB (169.289 KG) DODIC: A555 NSN:1305-01-658-2714 ROUND CNT:11000 AMMUNITION, EXPLOSIVES, FIREWORKS, OR CHEMICAL MUNITIONS, NOIBN/ TCN:FV483051601549XZX CU:100.0 COMMODITY:06430003 APPRO: SEE CORRECTION NOTICE CONTINUATION SHEET		12. BILL OF LADING TO READ (Show how the corrected information should read) ***** REASON ***** 374.95 ***** DESCRIPTION OF ARTICLES DETAIL ***** EQUIPMENT 1 2, PLT, X, UN0339, CARTRIDGES, SMALL ARMS, 14C, 4,435.0 LB FLASHPOINT:0 TOT HAZ QTY: 4335.0 LB (1,966.356 KG) NET EXP WEIGHT: 373.219 LB (169.289 KG) DODIC: A555 NSN:1305-01-658-2714 ROUND CNT:11000 AMMUNITION, EXPLOSIVES, FIREWORKS, OR CHEMICAL MUNITIONS, NOIBN/ TCN:FV483051601549XZX CU:100.0 COMMODITY:06430003 APPRO: SEE CORRECTION NOTICE CONTINUATION SHEET
13. AUTHORITY FOR CORRECTION (Tariff and item numbers; classification and item number; or other authority for making change.) DOD 4500.9-R CHAPTER 206, PARA. H		
14. REMARKS (Pertinent information not otherwise on the form. If more space is required, use reverse side of this form.) ADDED TYPE OF PACK TO THE CARGO UNIT DESCRIPTION.		
15. INFORMATION COPY TO (Name and address, including ZIP Code) [REDACTED]		16. SIGNATURE AND TITLE OF INITIATING OFFICIAL JOSHUA EATON, TRANSPORTATION OFFICER
		17. CARRIER REPRESENTATIVE'S SIGNATURE (Require when notice is initiated by shipper and transportation charges are affected) Larry Atkinson

COMMERCIAL BILL OF LADING CORRECTION NOTICE

SHEET NO. 2

1. CBL NUMBER

2. DATE CBL WAS ISSUED

3. DATE NOTICE PREPARED

2025-07-14

2025-07-14

FRUT
EXPLOSIVES AMMO SUB 3
2 FT CU:100.0 52L44W38H 4435.0LB

2, PCS, X, UN0430, ARTICLES, PYROTECHNIC, 1.3G, 112.0 LB
FLASHPOINT:0
TOT HAZ QTY: 112.0 LB (50.803 KG)
NET EXP WEIGHT: 14.298 LB (6.485 KG)
DODIC: 1.601 NSN:1370-01-614-5083
ROUND CNT:300
AMMUNITION, EXPLOSIVES, FIREWORKS, OR CHEMICAL
MUNITIONS, NOIBN/
TCN:FV483050970182XXX CU:6.0
COMMODITY:06430002
APPRO:

FRUT
EXPLOSIVES AMMO SUB 2
2 PC CU:6.0 23L13W16H 112.0LB

1, PLT, X, UN0186, ROCKET MOTORS, 1.3C, 1,457.0 LB
FLASHPOINT:0
TOT HAZ QTY: 1357.0 LB (615.535 KG)
NET EXP WEIGHT: 512.352 LB (232.399 KG)
DODIC: HA07 NSN:1340-01-424-5819
ROUND CNT:72
MISSILES OR ROCKETS, GUIDED WITH WARHEADS, CLASS
1, DIVISIONS 1
TCN:V0916751648357XXX CU:43.0
COMMODITY:06430004
APPRO:
NNAO
EXPLOSIVES AMMO SUB 4
1 FT CU:43.0 49L41W37H 1457.0LB

FRUT
1 PALLET @ 48 WOODEN BOXES
1 PALLET @ 7 WOODEN BOXES
EXPLOSIVES AMMO SUB 3
2 FT CU:100.0 52L44W38H 4435.0LB

2, PCS, X, UN0430, ARTICLES, PYROTECHNIC, 1.3G, 112.0 LB
FLASHPOINT:0
TOT HAZ QTY: 112.0 LB (50.803 KG)
NET EXP WEIGHT: 14.298 LB (6.485 KG)
DODIC: 1.601 NSN:1370-01-614-5083
ROUND CNT:300
AMMUNITION, EXPLOSIVES, FIREWORKS, OR CHEMICAL
MUNITIONS, NOIBN/
TCN:FV483050970182XXX CU:6.0
COMMODITY:06430002
APPRO:

FRUT
2 WOODEN BOXES @ 150 EACH
EXPLOSIVES AMMO SUB 2
2 PC CU:6.0 23L13W16H 112.0LB

1, PLT, X, UN0186, ROCKET MOTORS, 1.3C, 1,457.0 LB
FLASHPOINT:0
TOT HAZ QTY: 1357.0 LB (615.535 KG)
NET EXP WEIGHT: 512.352 LB (232.399 KG)
DODIC: HA07 NSN:1340-01-424-5819
ROUND CNT:72
MISSILES OR ROCKETS, GUIDED WITH WARHEADS, CLASS
1, DIVISIONS 1
TCN:V0916751648357XXX CU:43.0
COMMODITY:06430004
APPRO:
NNAO
1 PALLET @ 8 ALUMINUM CONTAINERS
EXPLOSIVES AMMO SUB 4
1 FT CU:43.0 49L41W37H 1457.0LB