



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

July 10, 2025

Hu Guohua  
General Manager  
Ningbo Boahulu Fire-Fighting Equipment Co., Ltd.  
No.28, Lane 155, North Jingu Road  
Yinzhou District, Ningbo, China

Reference No. 25-0027

Dear Mr. Hu Guohua:

This letter is in response to your March 5, 2025, letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the marking of refillable United Nations (UN) pressure receptacles in accordance with § 178.71(q) of the HMR.

We have paraphrased and answered your questions as follows:

- Q1. Is it permissible to mark the letters “DOT” within the required marking of § 178.71(q)?
- A1. UN pressure receptacles cannot have the letters “DOT” marked on them unless they also meet the requirements and standards of a U.S. Department of Transportation (DOT) specification cylinder.
- Q2. Is it permissible to mark the letters “DOT” in parentheses underneath the required markings of “USA” and the M number (USA/MXXXX)?
- A2. See answer A1.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster  
Chief, Regulatory Review and Reinvention  
Standards and Rulemaking Division

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March 5, 2025

Standards and Rulemaking Division  
Pipeline and Hazardous Materials Safety Administration  
Attn:PHH-10  
US Department of Transportation  
East Building  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001

Reference: 49 CFR Part 178.71 Interpretation Request

To whom it may concern:

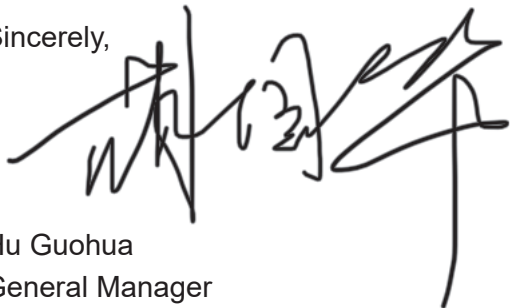
I am writing to request a letter of interpretation on the 49 CFR in regard to the marking of UN refillable pressure receptacles in 49 CFR 178.71(q).

Question 1: Is it permissible to mark the letters "DOT" within the required marking of 178.71(q)?

Question 2: If the Q1 is yes, is it permissible to mark the letters "DOT" in parenthesis underneath the USA/MXXXX, like "USA/ MXXXX" ?  
(DOT)

A reply as soon as possible would be greatly appreciated.

Sincerely,



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