

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Interpretation Request: Request for Written Interpretation Regarding DOT SP Modal Requirement
Date: Thursday, August 7, 2025 11:49:28
Attachments: [image001.png](#)
[image002.png](#)

Hi Yul,

Please see the below interpretation request.

The mailing address is:
14010 Interdrive West
Houston, TX 77032

Let us know if you need anything.

Janaye

From: David Olsen <dolsen@setenv.com>
Sent: Thursday, August 7, 2025 12:26 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: David Olsen <dolsen@setenv.com>
Subject: Request for Written Interpretation Regarding DOT SP Modal Requirement

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

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Request for Written Interpretation

Good morning,

I am requesting an interpretation regarding the modal requirements included in many DOT special permits, e.g., DOT-SP 13552, DOT-SP 11809, and DOT-SP 7835. The modal requirements for many of the DOT special permits state that *"a current copy of this special permit must be carried aboard each motor vehicle used to transport packages covered by this special permit."*

10. **MODAL REQUIREMENTS:** A current copy of this special permit must be carried aboard each motor vehicle used to transport packages covered by this special permit.

Question- If a transportation company were to develop an “electronic” DOT special permit book accessible by tablet or smart phone that housed all of the DOT special permits that the company was a party to, would this meet the requirement of the above modal requirement in lieu of having a physical hardcopy book of DOT special permits on the motor vehicle?

Your written response to this is greatly appreciated. If you require any further information, feel free to contact me at (281) 227-5166 or (281) 755-4992.

Thank you for your time,

David Olsen, Jr.

David Olsen, Jr CHMM
SET Environmental, Inc.
Technical Compliance Manager
(281) 755-4992 **CELL**

24-Hour Emergency 877.437.7455



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