



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

February 9, 2026

Via email: bill@pstrust.org

Mr. Bill Caram, Executive Director
Pipeline Safety Trust
1812 Cornwall Avenue
Suite 200
Bellingham, WA 98225

**Subject: Technical Assistance Grant Review
Determination of Non-Compliance and Imposition of Specific Conditions and
Remedial Actions for Fiscal Year 2024 and 2025 Awards**

Dear Mr. Caram:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has completed its review of the information received from the Pipeline Safety Trust (PST) regarding compliance with the terms and conditions applicable to certain awards made under the Technical Assistance Grant (TAG) program for the 2022, 2023, and 2024 Federal fiscal years (FY). As explained in more detail below, PHMSA has determined that the records PST maintained for these awards do not satisfy the requirements in 2 CFR part 200, and that certain specific conditions and remedial actions should be imposed on PST's use of the funds remaining under the 2024 and 2025 FY awards to address that non-compliance.

Statutory Framework

Congress has authorized PHMSA to “make grants for technical assistance to local communities, Indian Tribes, and groups of individuals (not including for-profit entities).”¹ These grants, provided under what is known as the TAG program, are to be used for “engineering, research, and other scientific analysis of pipeline safety issues, including the promotion of public participation on technical pipeline safety issues in proceedings related to” the Pipeline Safety Act.² Since authorizing the TAG program in the Pipeline Safety Improvement Act of 2002, Congress has expressly prohibited grant recipients from using any TAG funding “for lobbying or in direct

¹ 49 U.S.C. § 60130(a)(1).

² *Id.* at (d)(1).

support of litigation.”³ Congress later extended that prohibition to “direct advocacy for or against a pipeline construction or expansion project” in the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011.⁴

In the Protecting Our Infrastructure of Pipelines and Enhancing Safety Act of 2020 (2020 PIPES Act), Congress directed PHMSA to make a special \$1,000,000 TAG award “to an eligible applicant . . . for the purpose of improving the quality of technical assistance provided to communities or individuals under” 49 U.S.C. § 60130.⁵ Congress defined an eligible applicant as “a nonprofit entity that . . . is a public safety advocate; . . . has pipeline safety expertise; . . . is able to provide individuals and communities with technical assistance; and . . . was established with funds designated for the purpose of community service through the implementation of section 3553 of title 18 relating to violations of this chapter.”⁶ While Congress directed PHMSA to make the special \$1,000,000 TAG award “through a competitive selection process,” PST is the only entity that has ever qualified as an eligible applicant under this definition.⁷

Consistent with the 2020 PIPES Act, PHMSA has awarded \$4,000,000 in TAG funding to PST in recent years—\$1,000,000 for FYs 2022, 2023, 2024, and 2025, respectively. Each award was subject to explicit grant terms and conditions, including a provision obligating PST to comply with the requirements in 2 CFR part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards). As relevant here, 2 CFR part 200 generally requires Federal grant recipients to establish, document, and maintain an effective system of internal controls to ensure the integrity and proper use of Federal funding.⁸ 2 CFR part 200 also prescribes the cost principles that must be applied in determining allowable costs under Federal awards, including for the payment of employee salaries and wages.⁹

Procedural History

On February 6, 2025, the President of the United States issued a memorandum regarding the use of Federal grant funding by Nongovernmental Organizations (NGOs) (*Memorandum*).¹⁰

³ Pub. L. No. 107-355, § 9(a), Dec. 17, 2002, as originally codified at 49 U.S.C. § 60130(b).

⁴ Pub. L. No. 112-90, § 32(e), Jan. 3, 2012, codified as amended at 49 U.S.C. § 60130(b).

⁵ Pub. L. No. 116-260, div. R, title I, § 101(e), Dec. 27, 2020, codified at 49 U.S.C. § 60130(c)(2).

⁶ 49 U.S.C. § 60130(d)(2).

⁷ *Id.* On June 30, 2003, U.S. District Judge Barbara Jacobs Rothstein entered a judgment in a criminal case that the United States brought against the operator of the Olympic Pipeline for a failure that occurred on June 10, 1999, in Bellingham, Washington. The judgment directed the operator to provide \$4 million in funding to PST for the purpose of performing community service in furtherance of the sentencing principles provided in 18 U.S.C. § 3553(a).

⁸ 2 CFR § 200.303; *see also* 2 CFR § 200.1 (defining “internal control”).

⁹ 2 CFR § 200.430.

¹⁰ Memorandum on Advancing United States Interests When Funding Nongovernmental Organizations, DCPD-202500235 (Feb. 6, 2025).

In the *Memorandum*, the President directed all Federal agencies to, among other things, review the funding provided to NGOs to “align future funding decisions with the interests of the United States and with the goals and priorities of my Administration, as expressed in executive actions; as otherwise determined in the judgment of the heads of agencies; and on the basis of applicable authorizing statutes, regulations, and terms.”¹¹

In response to the *Memorandum*, on June 26, 2025, PHMSA notified PST that an outside auditor, Watkins Government Services LLC (Watkins), had been hired to assist PHMSA in conducting a compliance review of the FY 2022, 2023, and 2024 TAG awards for activities occurring through June 30, 2025. PHMSA advised PST that Watkins would be addressing, among other things, PST’s compliance with the requirements in 2 CFR Part 200 and the TAG award terms and conditions. PHMSA also advised PST that Watkins would be evaluating PST’s financial management systems, internal controls, and procurement practices during the time periods in question.¹²

On November 3, 2025, Watkins completed its portion of the compliance review and submitted a final report to PHMSA.¹³ Watkins identified several instances of noncompliance by PST in its report, including in the areas of internal controls, payroll costs, and cash disbursements. Watkins also made five specific recommendations to help ensure that PST’s policies and procedures would provide reasonable assurance of compliance with Federal statutes, regulations, and conditions of the TAG awards in the future.

Citing the information provided in the Watkins report, on November 19, 2025, PHMSA sent PST a request for additional records related to the FY 2022, 2023, and 2024 TAG awards. Specifically, PHMSA asked PST for records to substantiate the reasonableness of the payroll costs charged to each award and to demonstrate that PST had not used any funding to pay for the costs of performing prohibited activities, *i.e.*, “lobbying, for direct advocacy for or against a pipeline construction or expansion project, or in direct support of litigation.”¹⁴ PHMSA noted in its request

¹¹ *Id.*

¹² On September 30, 2025, PHMSA approved PST’s application for another \$1,000,000 TAG award for FY 2025. However, PHMSA advised PST in making the award that:

[PST] is currently undergoing an audit regarding programmatic, financial, and administrative management activities for TAG awards made in FY 2022 through 2024 and activities through June 30, 2025. If PHMSA determines PST has failed to comply with Federal statutes, regulations, or the terms and conditions of previous TAG awards, PHMSA reserves the right to impose additional specific conditions upon this award or to pursue the remedies for noncompliance set forth in 2 CFR 200.339.

On October 20, 2025, PST submitted a \$500,000 request for advance payment under the FY 2025 TAG award. PHMSA denied that request on November 19, 2025, based on the results of Watkins’ compliance review.

¹³ PST and PHMSA both received copies of a draft report from Watkins and were given the opportunity to provide comments to Watkins for its consideration in preparing the final report.

¹⁴ 49 U.S.C. § 60130(b).

that PST had acknowledged engaging in these activities during the period of performance for the FY 2022, 2023, and 2024 TAG awards in the Watkins report.

On December 19, 2025, PST responded to PHMSA's request by providing certain records, including sample Personnel Action Notices and employee timecards, as well as a list of the cost center codes that PST used for accounting purposes, memoranda prepared by four current PST employees, and a 4-page PowerPoint presentation that discussed PST's understanding of the TAG program.

On December 31, 2025, PHMSA advised PST that the records it submitted were incomplete. PHMSA urged PST to submit complete records for every PST employee and contractor at the earliest possible date. On January 20, 2026, PST responded by submitting additional Personnel Action Notices and timecards. PST did not indicate that any additional records would be submitted in response to PHMSA's requests at that time.

Determination of Non-Compliance

PHMSA has reviewed the records that PST submitted for the 2022, 2023, and 2024 FY TAG awards and determined that they do not satisfy the requirements in 2 CFR part 200. Specifically, the records do not accurately reflect the work performed or provide a reasonable basis for concluding that PST did not use TAG funding "for lobbying, for direct advocacy for or against a pipeline construction or expansion project, or in direct support of litigation."¹⁵ PST has acknowledged that it engaged in these prohibited activities during the compliance review period, and it has continued to do so since receiving the FY 2025 award.¹⁶ While PST is allowed to engage in prohibited activities, it must have adequate internal controls and recordkeeping practices in place to ensure that they are not being funded through the TAG awards. The records PST submitted do not meet that standard for the reasons explained below.

PST Records for FY 2022, 2023, and 2024 FY TAG Awards

PST submitted two categories of records to substantiate the payroll costs charged to FY 2022, 2023, and 2024 TAG awards: (1) Personnel Action Notices (PANs) and (2) timecards. The PANs, which PST states were used from October 2021 to April 2025,¹⁷ contain basic information about the employment status and payroll allocation for each employee, including whether the employee was full-time or part-time, the number of hours worked per week, the employee's annual and hourly salary, and the cost centers, or sources of funding, that PST used to pay the employee's salary as expressed on a percentage basis.

¹⁵ *Id.*

¹⁶ Decl. of Clayton Bodell in Supp. of Emergency Mot. for Stay Pending Appeal, Environmental Defense Center, et al. v. Pipeline and Hazardous Materials Safety Administration, et al., No. 25-8059 (9th Cir. Dec. 26, 2025).

¹⁷ The earliest effective date of the PANs that PST submitted is March 16, 2023. PST did not submit any PANs covering the period from October 1, 2021, through March 16, 2023.

The PANs identify six different employment actions that might justify an update to an employee's records. One of those employment actions was a change in payroll allocation, *i.e.*, a change to the cost centers, or sources of funding, that PST used to pay the employee's salary starting as of a certain effective date. The PANs also include a box where a reason could be provided to support a payroll allocation change. The reasons provided on the PANs generally consist of a few words or phrases, such as "update cost code allocation," "payroll allocation update," or the like. In a few instances, the PANs indicate that an employee's payroll allocation changed due to "workload." PST also maintained timecards for each employee while the PAN system was in effect.¹⁸ The timecards documented the hours worked and any leave taken for each employee during a particular pay period.

In April 2025, PST discontinued the use of the PANs and transitioned to a new timecard system. Like the PANs used previously, the new timecards provide basic information about the hours worked and any leave taken for each employee during a particular pay period. They also include information about the cost centers, or sources of funding, being used to pay for an employee's salary. Like the PANs, this information is presented on a percentage basis. Finally, the new timecards include a certification provision that requires each employee to "hereby certify that the work performed during this period was completed in accordance with the percentage allocation listed above."

Neither the PANs, nor the old or new timecards, provide any information about the activities that an employee performed during a specified time period, including whether an employee engaged in one of the prohibited activities that cannot be funded under the TAG program, *i.e.*, "lobbying," "direct advocacy for or against a pipeline construction or expansion project," or "litigation."¹⁹ The PANs and timecards also indicate that PST routinely used the FY 2022, 2023, and 2024 TAG awards to fund 90% or more of an employee's salary or wages.

PST Prohibited Activities During Period of Performance for FY 2022, 2023, and 2024 TAG Awards

PST has acknowledged—and the publicly available information confirms—that it engaged in prohibited activities that cannot be funded under the TAG program during the period of performance for the FY 2022, 2023, and 2024 awards.²⁰ For example, the Legislative Advocacy portion of the PST website includes testimony that PST provided before Federal and State legislative bodies on seven different occasions in 2022, 2023, 2024, and 2025.²¹ The Regulatory Advocacy page includes numerous comments that PST submitted during the same period in

¹⁸ The earliest timecards that PST submitted are for the April 1 to 15, 2023 pay period. PST did not submit any timecards covering the pay periods that occurred between October 1, 2021, through April 1, 2023.

¹⁹ 49 U.S.C. § 60130(b).

²⁰ <https://pstrust.org/advocacy/>.

²¹ <https://pstrust.org/legislative-advocacy/>.

proceedings involving pipeline construction or expansion projects before PHMSA²² and the Federal Energy Regulatory Commission.²³ The Legal Advocacy page also includes three amicus briefs that PST submitted in 2024 and 2025 in litigation involving a carbon dioxide pipeline construction project and a challenge to a PHMSA final rule.²⁴ PHMSA further notes that the publicly available information confirms that PST has continued to engage in prohibited activities during the period of performance for the FY 2025 TAG award.²⁵

Analysis in Support of Non-Compliance Determination

PST's records do not provide a reasonable basis for concluding that PST did not use the FY 2022, 2023, or 2024 TAG awards to fund prohibited activities. Per 2 CFR part 200, charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must be supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.²⁶ As previously noted, PST submitted PANs and timecards to substantiate the payroll costs charged to the TAG awards during the compliance review period. PST has also acknowledged—and the publicly available information confirms—that its employees engaged in prohibited activities

²² <https://pstrust.org/comment-to-phmsa-on-special-permit-application-for-natural-gas-pipeline-company-of-america-docket-no-phmsa-2025-0011/>; <https://pstrust.org/comments-to-phmsa-on-special-permit-application-for-tc-energy-for-gas-transmission-northwest-llc-docket-no-phmsa-2024-0055/>; <https://pstrust.org/comment-to-phmsa-on-special-permit-application-for-rockies-express-pipeline-docket-no-phmsa-2024-0011/>; <https://pstrust.org/comment-to-phmsa-on-special-permit-application-for-gulf-south-pipeline-company-llc-docket-no-phmsa-2023-0126/>; <https://pstrust.org/comment-to-phmsa-on-special-permit-application-for-dtm-gas-storage-company-docket-no-phmsa-2023-0071/>; <https://pstrust.org/comment-to-phmsa-on-special-permit-application-for-southern-natural-gas-company-docket-no-phmsa-2023-0136/>; <https://pstrust.org/letter-sign-on-to-phmsa-army-corps-of-engineers-and-ferc-on-safeguards-for-mountain-valley-pipeline/>; <https://pstrust.org/comment-to-phmsa-on-east-tennessee-natural-gas-transmission-llc-special-permit-application/>; <https://pstrust.org/comment-to-phmsa-on-columbia-gas-transmission-llc-special-permit-application/>; <https://pstrust.org/comment-to-phmsa-on-colorado-interstate-gas-co-special-permit-application/>; <https://pstrust.org/comment-to-phmsa-on-tennessee-gas-pipeline-company-llc-special-permit-application/>.

²³ <https://pstrust.org/letter-to-ferc-on-mountain-valley-pipeline-llc-request-to-place-project-facilities-in-service-docket-no-cp16-10-000/>; <https://pstrust.org/pst-request-for-extension-on-transco-southeast-supply-enhancement-project-environmental-scoping-period-docket-no-pf24-2-000/>; <https://pstrust.org/comment-to-ferc-on-environmental-scoping-for-transco-southeast-supply-enhancement-project-docket-no-pf24-2-000/>; <https://pstrust.org/letter-in-opposition-to-gas-transmission-northwest-llcs-proposed-gtn-xpress-project-docket-no-cp22-2-000/>; <https://pstrust.org/letter-sign-on-to-phmsa-army-corps-of-engineers-and-ferc-on-safeguards-for-mountain-valley-pipeline/>; <https://pstrust.org/comment-to-ferc-on-gas-transmission-northwests-gtn-xpress-project-application-docket-no-cp22-2-000/>; <https://pstrust.org/comment-to-ferc-on-mountain-valley-pipeline-certificate-of-public-convenience-docket-no-cp16-10-000/>.

²⁴ <https://pstrust.org/legal-advocacy/>.

²⁵ See e.g., <https://pstrust.org/pipeline-safety-trust-comment-on-special-permit-request-of-southern-natural-gas-company-llc-sng-docket-no-phmsa-2023-0136/>; <https://pstrust.org/pipeline-safety-trust-comment-on-special-permit-request-of-gas-transmission-northwest-llc-gtn-docket-no-phmsa-2024-0055/>; Decl. of Clayton Bodell in Supp. of Emergency Mot. for Stay Pending Appeal, Environmental Defense Center, et al. v. Pipeline and Hazardous Materials Safety Administration, et al., No. 25-8059 (9th Cir. Dec. 26, 2025).

²⁶ 2 CFR 200.430(g)(1)(i).

throughout this period. To comply with the requirements of 2 CFR part 200, the PANs and timecards that PST submitted must demonstrate that PST did not use the TAG awards to fund these prohibited (or unallowable) activities.²⁷

The PANs do not provide any information about the work an employee performed during a particular period of time, including whether that work involved “lobbying,” “direct advocacy for or against a pipeline construction or expansion project,” or “litigation.”²⁸ The PANs simply provide percentage-based information about the cost centers that PST used to fund an employee’s salary. These cost center allocations only applied prospectively starting as of a certain effective date and generally remained in effect for extended periods of time. Moreover, the PANs do not provide any meaningful information about the reasons for PST changing the cost center allocation for an employee. The reasons entered on the PANs generally consist of a few words, such as “update cost code allocation,” “payroll allocation update,” or, in a few instances, refer to “workload” considerations.

The timecards do not provide any information about the work an employee performed during a particular pay period either. The old and new timecards simply document the hours worked and any leave taken for each employee. While the new timecards also require an employee to certify the accuracy of the applicable percentage-based cost center allocations in effect for a particular pay period, they do not include any additional information that would allow PHMSA to verify that certification. Nor do the new timecards indicate whether an employee engaged in prohibited activities during a particular pay period and, if so, the amount of time that an employee spent engaging in those activities. Without that information, PST’s system of internal controls cannot provide reasonable assurance that prohibited activities are not being funded under the TAG awards.

The other documents that PST submitted do not overcome the inadequacy of the information provided in the PANs and timecards. The employee memoranda, prepared in December 2025, are not contemporaneous records that PST generated to ensure the integrity and proper use of TAG funding. The memoranda consist of employee statements that purport to describe events that occurred over the course of several years and which cannot be corroborated based on the information provided in the PANs or timecards. The 4-page PowerPoint presentation, prepared in February 2025, is not a contemporaneous record either and provides little meaningful information about PST’s use of the FY 2022, 2023, and 2024 TAG awards. It only includes a bulleted list of very short, general statements about PST’s understanding of the costs that can be charged to the TAG program, as well as several brief references to the prohibited activities that cannot be funded under the TAG awards, such as “[d]esign work for advocacy materials,” “[l]obbyists,” and “[a]dvocacy gatherings.”

²⁷ 2 CFR 200.430(g)(1)(vi) (stating that “[c]harges to Federal awards for salaries and wages must be based on records that,” among other things, “[s]upport the distribution of the employee’s salary or wages among specific activities or cost objectives if the employee works on . . . an unallowable activity”).

²⁸ 49 U.S.C. § 60130(b).

For these reasons, PHMSA has determined that the records that PST submitted for the 2022, 2023, and 2024 FY TAG awards do not satisfy the requirements of 2 CFR part 200. The records do not accurately reflect the work performed or provide a reasonable basis for concluding that PST did not use TAG funding “for lobbying, for direct advocacy for or against a pipeline construction or expansion project, or in direct support of litigation.”

Specific Conditions

PHMSA is imposing specific conditions on PST’s use of the funds remaining for the FY 2024 and 2025 TAG awards. Under 2 CFR part 200, Federal agencies are authorized to include specific conditions in a Federal grant award “based on an analysis of” certain “factors,” one of which is “[t]he recipient’s or subrecipient’s history of compliance with the terms and conditions of Federal awards[.]”²⁹ In addition, 2 CFR part 200 provides a non-exhaustive list of the specific conditions that Federal agencies may add to an award to address a recipient’s compliance history.³⁰

Having considered the facts and circumstances involved in PST’s failure to comply with the terms and conditions applicable to its 2022, 2023, and 2024 FY TAG awards, PHMSA is requiring PST to implement a new system of internal controls and recordkeeping practices to ensure the integrity and proper use of the remaining funds authorized under the 2024 and 2025 FY TAG awards. Specifically, PST must:

- Develop and implement new TAG program procedures. The new procedures must describe the terms and conditions applicable to the 2024 and 2025 FY TAG awards and include specific instructions on the types of activities that may be charged to the awards. The procedures must also include specific instructions on the types of prohibited activities that may not be charged to the TAG awards, including lobbying, direct advocacy for or against a pipeline construction or expansion project, and direct litigation support. The new procedures must be completed and reviewed by each employee or contractor within the next 30 days.
- Document the amount of time that each PST employee or contractor spends engaging in prohibited activities. The time must be recorded in reasonable increments on a daily basis and accompanied by a brief narrative description of the prohibited activity. The total amount of time that a PST employee or contractor spends on prohibited activities must be included on the timecard that the employee or contractor submits for each pay period. The new timekeeping practices must be developed and implemented within the next 30 days.

PST must provide PHMSA with documentation demonstrating PST’s compliance these specific conditions. Once that documentation is provided, PHMSA will notify PST in writing that it may resume performance activities under the 2024 and 2025 FY TAG awards. PHMSA will

²⁹ 2 CFR 200.208(b).

³⁰ 2 CFR 200.208(c).

also resume processing any payment reimbursement requests submitted by PST at that time, subject to the additional remedy discussed below.

PST may file a request for reconsideration of the specific conditions with PHMSA's Chief Financial Officer within the next 30 days.³¹ If you have any questions or concerns about the special conditions or the process for seeking reconsideration, please free to contact me via email at michael.reles@dot.gov.

Remedies for Non-Compliance

In addition to imposing specific conditions, PHMSA is requiring PST to take certain remedial actions to address its failure to comply with the terms and conditions applicable to the 2022, 2023, and 2024 FY TAG awards. 2 CFR part 200 provides a list of remedial actions that Federal agencies may take upon a determination that a recipient's "noncompliance cannot be remedied by imposing specific conditions"³² One of those remedial actions is to "[d]isallow costs for all or part of the activity associated with the noncompliance of the recipient or subrecipient."³³

As explained above, PHMSA has determined that PST failed to comply with the terms and conditions applicable to its 2022, 2023, and 2024 FY TAG awards. Specifically, PST's records do not accurately reflect the work performed or provide a reasonable basis for concluding that PST did not use TAG funding "for lobbying, for direct advocacy for or against a pipeline construction or expansion project, or in direct support of litigation." PHMSA has also determined that PST's non-compliance, which involves the failure to ensure that Federal funding was not used to pay for statutorily prohibited activities over the course of successive TAG awards, cannot be remedied solely by imposing specific conditions. PHMSA is therefore prohibiting PST from using the remaining funds authorized under the 2024 and 2025 FY TAG awards for the following purpose:

- PST shall not use any of these funds to pay the salary or wages of the Executive Director. As the principal officer responsible for the management of PST during the period of performance for the FY 2022, 2023, and 2024 TAG awards, the Executive Director had both the authority and an obligation to prevent or correct the organizational failures that led to PST's failure to comply with the terms and conditions applicable to these awards.

³¹ 2 CFR 200.208(d)(5).

³² 2 CFR 200.339. Federal agencies exercise plenary discretion to impose both specific conditions and other remedies for non-compliance in the same action. 2 CFR part 200 does not require that specific conditions be imposed prior to any other remedial action. *See Purpose Built Families Foundation, Inc. v. McDonough*, 36 Vet. App. 345, 364–66 (2023) ("In other words, the regulation is one that *empowers* an agency by providing broad discretion in terms of remedial actions [A remedy for non-compliance] may be imposed on a grantee when the awarding agency determines that [specific] conditions cannot remedy noncompliance.") (emphasis in original).

³³ 2 CFR 200.339(b).

PST may file an administrative appeal with the DOT Office of Grants and Financial Assistance challenging this remedy within the next 30 days.³⁴ For any questions about the process for filing an administrative appeal, please contact Matthew Hawkins, Director, DOT Office of Grants and Financial Assistance, via email at matthew.hawkins@dot.gov.

Conclusion

PHMSA has determined that the records PST maintained for the FY 2022, 2023, and 2024 TAG awards do not satisfy the requirements of 2 CFR part 200, and that certain specific conditions and remedial actions should be imposed on PST's use of the funds remaining under the 2024 and 2025 FY awards to address that non-compliance.

Sincerely,

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Cc: Scott S. Sheffler, Venable LLP
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Terence Carlson, DOT
Matthew Hawkins, DOT

³⁴ 2 CFR 200.342.