Cajar, J.
26-0060

A Munich Re company

Standards and Rulemaking Division
Pipeline and Hazardous Materials Safety Administration
Attn: Mr. Shane Kelley
US DOT/PHMSA (PHH-10)
1200 New Jersey Avenue,
SE East Building,
Washington, DC 20590-0001

07 May 2026

Dean Martin
Carriage of Dangerous Goods, Technical Manager
Global Inspection and Engineering Services (GIES)
Dean_martin@hsb.com

The Hartford Steam Boiler Inspection and Insurance Co.
One State Street
P.O. Box 5024
Hartford, CT 06102-5024
www.munichre.com/HSB

To Mr. Kelley:

We are writing to formally request USDOT consideration and acceptance of a European Notified Body type approval that is not an IIA, in conjunction with supporting test data generated by a ISO/IEC 17025 accredited testing laboratory, for the subject cylinder design type.

Background and Regulatory Context
The UN pressure cylinder design type under consideration has been evaluated and type approved by a European Notified Body, acting as an Inspection Body accredited to ISO/IEC 17020 (Type A) and approved in accordance with the Agreement Concerning the International Carriage of Dangerous Goods Regulations by Road and Rail (ADR/RID) and ISO 7866:2012+Cor1:2014. While the European Notified Body is not designated as an Independent Inspection Agency (IIA) under U.S. regulations, the certification activities and supporting evaluations were conducted in full alignment with the applicable international standards referenced in 49 CFR, except for the 'witnessing' of the intercrystalline corrosion testing.
The intercrystalline corrosion testing referenced in the type approval was performed by an accredited ISO/IEC 17025, a testing laboratory accredited by the German Accreditation Body (DAkkS). See attached link ISO 17025 accredited lab. DAkkS accreditation is issued in accordance with ISO/IEC 17025, ensuring technical competence, impartiality, and internationally recognized conformity assessment practices.

Precedent and Previous USDOT Interpretation
We respectfully note that in prior correspondence with USDOT regarding a previously approved Multi Element Gas Container (MEGC) assembly, a similar scenario was reviewed. In that case, USDOT issued an interpretation permitting an IIA to review and accept testing and certification work performed by a notified body holding ISO/IEC 17020 (Type A) accreditation without requiring retesting, with the understanding that such acceptance was made at the IIA's discretion and risk, which we believe is a pragmatic approach.
A copy of the applicable USDOT interpretation Reference No. 25-0034 and supporting justification is attached for reference.

07 May 2026

Dean Martin
Carriage of Dangerous Goods, Technical Manager
Global Inspection and Engineering Services (GIES)

Dean_martin@hsb.com

Requested Approach

Based on this established precedent, we are seeking confirmation that the same regulatory approach may be applied in the current case, specifically that:

- An IIA may review and evaluate the type approval documentation and associated test reports issued by the European Notified Body accredited to ISO/IEC 17020 (Type A) which aligns with the European model.
- The corrosion test results generated by a ISO/IEC 17025 accredited testing laboratory may be accepted without retesting, given the laboratory's DAkkS accreditation and demonstrated technical competence shown through their ISO/IEC 17025 accreditation;
- The IIA may, at its own discretion and risk, accept the ISO/IEC 17020 (Type A) accredited notified body's work as technically equivalent for purposes of U.S. approval, consistent with the previously issued USDOT interpretation for an MEGC project.

We believe this approach is justified for the following reasons:

- The ISO/IEC 17020 (Type A) accredited inspection body is a well-established notified body operating under internationally recognized conformity assessment frameworks for 20+ years.
- The ISO/IEC 17025 accredited testing Laboratory holding DAkkS accreditation provides assurance of laboratory competence equivalent to other internationally accepted accreditation bodies.
- The requested approach does not reduce the technical rigor or safety intent of 49 CFR requirements.
- USDOT has previously recognized and allowed this pathway under comparable circumstances for MEGC assemblies.

Conclusion

We do not believe that repeating the intercrystalline corrosion test would provide any additional safety, compliance, or technical value. The test has already been performed in full accordance with the applicable ISO standards by the ISO/IEC 17025 accredited testing Laboratory, accredited by the German Accreditation Body (DAkkS), and the results have been comprehensively reviewed and accepted by European Notified Body accredited to ISO/IEC 17020 (Type A). The specific test scope, methodology, and acceptance criteria that would be subject to any additional witnessing or limited retesting have already undergone detailed technical scrutiny through these reviews. In light of the extent of prior independent evaluation and accreditation oversight, replication of this narrowly defined test activity would not yield new information beyond what has already been assessed and found acceptable by competent and recognized authorities.

07 May 2026

Dean Martin
Carriage of Dangerous Goods,
Technical Manager
Global Inspection and Engineering
Services (GIES)

Dean_martin@hsb.com

We respectfully request USDOT's confirmation that the previously approved interpretation and acceptance approach may be applied to cylinder design type. We believe this would ensure regulatory consistency while maintaining the required level of safety and technical compliance.

Please let us know if additional information, documentation, or technical clarification is needed to support this request.

Thank you for your consideration.

Note: This interpretation request is specific intercrystalline corrosion testing, however we also consider this request suitable for other specialized tests such as sustained-load cracking or pressure-cycling test which are likely to be performed externally by an ISO/IEC 17025 accredited testing Laboratory.

Sincerely,
Dean Martin CEng MWeldI