



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

AUG 16 2018

Jennifer A. Giblin
Senior Counsel
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Reference No. 18-0062

Dear Ms. Giblin:

This letter is in response to your April 17, 2018, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to acceptable abbreviations for units of measure. You state that UNECE Recommendation No. 20 Annex I and Annex II provide "KGM" as the abbreviation for kilogram and ask if it is an acceptable abbreviation to indicate mass in kilograms on package markings or shipping papers under the HMR.

The answer is no. UNECE Recommendation No. 20 states under the "Principles for Inclusion in the Code List":

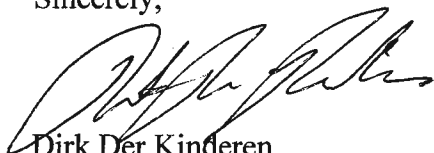
The codes are intended for application in everyday trade transactions where the increasing use of electronic data exchange makes it desirable to establish such codes. [T]he code list provides another international instrument for the harmonization of terms used in trade aiming at greater clarity and facility in the execution of international trade transactions.

In the HMR, abbreviations, when allowed, must be universally recognized to eliminate confusion between offerors, third-party logistics companies, carriers, enforcement agents, and other interested parties. The HMR is intended to communicate information regarding hazardous materials in transportation, not necessarily facilitate everyday trade transactions through electronic data interchange.

It is the opinion of this Office that the "common code" presented in Column 6 of UNECE Recommendation No. 20 Annex II is not an abbreviation or representational symbol for the unit of measure widely recognized by the hazardous materials community. Therefore, its use may create confusion and lead to frustration of hazardous materials shipments in transportation.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Dirk Der Kinderen', written in a cursive style.

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

PATRICK
171.10
Labeling
18-0062

January, Ikeya CTR (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Tuesday, April 17, 2018 4:49 PM
To: Hazmat Interps
Subject: FW: Interpretation

Hi Alice & Ikeya,

Below is a request for a letter of interpretation. Please let me know if you have any questions.

Thank you,
Jodi

From: Giblin, Jennifer [mailto:JGiblin@crowell.com]
Sent: Tuesday, April 17, 2018 2:32 PM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Interpretation

Hello –

I'm looking for a formal interpretation regarding the abbreviation for kilogram under the PHMSA hazmat regulations. The Annex I and Annex II of UNECE Recommendation No. 20 – Units of Measure used in International Trade provide KGM as the abbreviation for kilogram. Is this an acceptable abbreviation under the hazmat regulations, whether on a shipping paper or as a package marking? Although 49 CFR § 171.10 lists kg as an abbreviation for kilogram, this does not appear to be mandatory.

Thank you,
Jennifer Giblin

Jennifer A. Giblin
Senior Counsel
jgiblin@crowell.com
Direct: 1.202.624.2586 | Fax: 1.202.628.5116

Crowell & Moring LLP | www.crowell.com
1001 Pennsylvania Avenue, NW
Washington, DC 20004