



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

AUG 23 2019

Thomas J. Ziebell  
Sr. Editor – Hazardous Materials Trans.  
J.J. Keller and Associates, Inc.  
P.O. Box 368  
Neenah, WI 54957

Reference No. 19-0028

Dear Mr. Ziebell:

This letter is in response to your March 12, 2019, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the marking requirements for lithium cells and batteries. Specifically, you ask whether more than one telephone number may be provided on the mark required by § 173.185(c)(3). You describe a scenario where one telephone number is provided for the domestic transportation portion of a trip and a different telephone number for the international transportation portion.

The answer is yes. Section 173.185(c)(3)(i)(C) does not prohibit including multiple telephone numbers provided each number reaches a person that can provide additional information on the contents of the package. Furthermore, identifying that one number is for domestic purposes and the other number is for international purposes is also not prohibited.

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

Sincerely,

Dirk Der Kinderen  
Chief, Standards Development  
Standards and Rulemaking Division

Cuccarone  
§ 173.185 (c)(3)(i)(C)  
19-0028

**Dodd, Alice (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Tuesday, March 12, 2019 2:24 PM  
**To:** Hazmat Interps  
**Subject:** FW: Letter of Interpretation Request

Hello Alice and Ikeya,

Please see the letter of interpretation request below.

**Lysie Patschke**  
Transportation Regulatory Specialist  
Hazardous Materials Information Center (HMIC)

**From:** Ziebell, Thomas (Tom) J [mailto:TZiebell@jjkeller.com]  
**Sent:** Tuesday, March 12, 2019 12:42 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Cc:** Atkinson, Michael L <MATkinson@jjkeller.com>; Ness, Heather L <HNess@jjkeller.com>  
**Subject:** Interpretation on 173.185(c)(3)(i)(C)

Request for interpretation.

I'm requesting an interpretation on the marking requirements in 173.185(c)(3)(i)(C). The text in 173.185(c)(3)(i)(C) reads that the \*\* must be replaced by a telephone number. I interpret this to mean one telephone number. This was confirmed by Lysie in the Information Center when we spoke today and she also said there is no written interpretation on this.

However, we produce this marking for customers and many want two telephone numbers listed. One number for calls when the package is in the U.S. and the other number for when the package is not in the U.S. Other companies that produce this marking add additional telephone numbers and text so frequently that the industry believes this is in compliance with the regulations.

Can two telephone numbers be listed on the marking? If two are allowed, can words such as "For domestic" or "For international" be added to differentiate between the two?

Thank you very much for your assistance.



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