



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

1200 New Jersey Avenue, SE
Washington, DC 20590

August 7, 2020

Todd Hargrove
Hazardous Materials Lead
Southwest Airlines Co.
2702 Love Field Drive
Dallas, TX 75235

Reference No. 20-0052

Dear Mr. Hargrove:

This letter is in response to your June 29, 2020, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) when providing the pilot in command and flight dispatcher with shipping paper and other information regarding onboard hazardous materials in accordance with § 175.33.

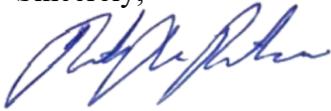
We have paraphrased and answered your questions as follows:

- Q1. You ask whether the notification of onboard hazardous materials information must be a direct message to the flight dispatcher.
- A1. The answer is no. In accordance with § 175.33(a), when a hazardous material subject to the provisions of the HMR is carried in an aircraft, the operator of the aircraft must provide the pilot-in-command and the flight dispatcher, or other ground support personnel with responsibilities for operational control of the aircraft, with accurate and legible written information (e.g., handwritten, printed, or electronic form) as early as practicable, but in no case later than when the aircraft moves under its own power before departure of the aircraft.
- Q2. You ask whether providing the flight dispatcher with hazardous materials information by making the information available in a flight system meets the requirements of § 175.33(a).

A2. The answer is yes. Making the information available and readily accessible in a flight system for use by the flight dispatcher meets the intent of the requirement if the information required by § 175.33(a) is included in the system and is provided in the manner as discussed in answer A1.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Dirk Der Kinderen". The signature is fluid and cursive, with a prominent initial "D".

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

From: [INFOCNTR \(PHMSA\)](#)
To: [Hazmat Interps](#)
Subject: FW: 175.33 Interpretation
Date: Tuesday, July 21, 2020 3:09:55 PM
Attachments: [image001.png](#)

Hello Alice and Ikeya,

Please see below for letter of interpretation request.

Thank you,
Kathryn (HMIC)

From: Todd Hargrove [mailto:Todd.Hargrove@wnco.com]
Sent: Monday, June 29, 2020 12:17 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: 175.33 Interpretation

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

I'm requesting an official interpretation on the following requirements per 49 CFR part 175.33, as specifically listed below.

175.33(a)

Question 1: When providing Dispatch with the onboard hazardous materials information, does this need to be a direct message notification to the Dispatcher?

Question 2: When providing Dispatch with the hazardous material information, is this requirement met by only having the Dangerous Goods information available in our flight system and accessible to the Dispatcher in the event the information is needed?

Regards,

Todd Hargrove USAF(Ret.)
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