



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

MAR 25 2013

Mr. Mike Moetsch
Manager DG/HM Transportation & Phytosanitary Measures
Deere & Company WW Supply Management Compliance
3400 80th Street
Moline, IL 61265

Ref. No.: 13-0043

Dear Mr. Moetsch:

This is in response to your February 11, 2013 e-mail requesting clarification of the requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to fire extinguishers transported with self-propelled vehicles. Specifically, you ask whether a fire extinguisher may be transported in a fiberboard box that is banded to the vehicle and if this would be considered securely attached as required by 173.220(f).

The answer to your question is yes. Assuming the vehicles are being transported on another motor vehicle and that the requirements of 173.220(f) are satisfied, a fire extinguisher in fiberboard box attached to the vehicle by banding would be considered securely attached.

As prescribed in 173.220(f), fire extinguishers that are integral components of the motor vehicle, that are necessary for the operation of the vehicle, or for the safety of its operator or passengers, must be securely installed in the motor vehicle. Such items are not otherwise subject to the requirements of this subchapter.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Delmer Billings
Senior Regulatory Advisor
Standards and Rulemaking Division

Wiener
§173.309
§173.220

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Monday, February 11, 2013 11:25 AM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Fire Extinguisher Securely Attached Clarification

Fire Extinguishers
13-0043

Hi Carolyn,

We received the following request for a formal letter of interpretation.

Thanks,
Victoria

From: Moetsch Michael P [<mailto:MoetschMichaelP@JohnDeere.com>]
Sent: Monday, February 11, 2013 10:46 AM
To: INFOCNTR (PHMSA)
Cc: Moetsch Michael P; Meierotto Connie
Subject: Fire Extinguisher Securely Attached Clarification

Office of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety Administration

February 11, 2013

Dear Sir/Madam:

I am requesting clarification of the requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171 – 180) applicable to fire extinguishers transported with self-propelled vehicles. Per 49 CFR 173.220 (f) the extinguisher must be securely attached.

A clarification is requested for the true meaning of securely attached. If a fire extinguisher is placed in a fiberboard carton that is banded to the equipment does this satisfy the intent of securely attached?

I have reviewed Letter of Interpretation 09-0041 but it does not clearly state the intent of securely attached.

Sincerely,

Mike Moetsch
Deere & Company WW Supply Management Compliance
Manager DG/HM Transportation & Phytosanitary Measures
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