

Mr. Giles M. Crabtree, Product Engineer  
American Meter Company  
13500 Philmont Avenue  
Philadelphia, Pennsylvania 19116

Dear Mr. Crabtree:

This refers to your letters of November 16 and December 8, 1970 to Mr, Frank Fulton of the Office of Pipeline Safety of this Department, concerning needle valves manufactured by your company.

Because liquid pipelines engaged in interstate commerce are under jurisdiction of the Federal Railroad Administration, your letters were referred to this Bureau for reply.

A review has been made of your Bulletin 420.2 in which the needle valves in question are described. It is noted that the valves are used for pipe sizes 1/8" through 1/2" on measurement gages and various control mechanisms. Obviously, valves of those sizes would be external to main line pipe, and would not be used to control the flow of a product moving in interstate commerce. Therefore, the provisions of Section 195.116 of the regulations governing the transportation of liquids by pipeline do not apply to valves as described in Bulletin 420.2

Sincerely yours,

Mac E. Rogers  
Director  
Bureau of Railroad Safety