

**U.S. Department
of Transportation**

**Research and
Special Programs
Administration**

Jul 24 1996

Mr. Allan Porter
Vice-President
Porter Graphics, Inc.
P.O. Box 311568
New Braunfels, TX 78131-1568

Dear Mr. Porter:

Thank you for your letter inquiring about the required print size for gas and hazardous liquid pipeline markers. Your letter indicates that the strokes on some of the letters in your font are slightly less than 1/4 inch.

Federal regulations state that gas pipeline markers must display critical words, such as "Warning Gas Pipeline," in letters "at least one inch high with one-quarter inch stroke" (49 CFR 192.707(d)(1)). Regulations for hazardous liquid pipeline markers, require that critical words must be printed in letters "at least one inch high with an approximate stroke of one-quarter inch" (49 CFR 195.410(a)(2)(I)). The language is identical except for the use of the word "approximate" in the liquid regulations.

In responding to previous requests for interpretation on this issue, we have stated that fonts containing strokes less than 1/4" in width could not be used on gas pipeline markers. However, we are increasingly aware that the inflexibility of this regulation places an unnecessary burden on both operators and firms which manufacture these markers.

Moreover, the President's Regulatory Reinvention Initiative directs federal agencies to review its regulations in order to identify those which are unduly restrictive or unnecessary. The Office of Pipeline Safety has already begun this process. Accordingly, we intend to amend 192.707(d) to make it consistent with 195.410(a)(2)(ii) to provide more flexibility in meeting the pipeline marker requirements. We are directing our field staff to suspend enforcement of 192.707(d) until this change is effected.

In light of the pending change, your font may be used for critical words on gas pipeline markers. I hope you find this information helpful. Please call me at (202) 366-4595 if you need any further assistance.

Sincerely,

Cesar DeLeon
Deputy Associate Administrator
for Pipeline Safety