



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

AUG 15 2000

Mr. Robert Keel  
Gander Chemical Company, Inc.  
819 Laura Street  
Sun Prairie, WI 53590

Ref. No. 00-0180

Dear Mr. Keel:

This is in response to your letter dated June 29, 2000, concerning the applicability of the Hazardous Materials Registration Program as specified in 49 CFR Part 107, Subpart G. Specifically, you ask if your company must register even if you have no involvement in shipping your material (i.e., you only call the order into your supplier and invoice the customer).

Since you do not perform any functions of a shipper or carrier and do not engage in any of the activities specified in § 107.601, you are not required to register.

I hope this satisfies your request.

Sincerely,



John A. Gaie

Transportation Regulations Specialists  
Office of Hazardous Materials Standards



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Edward Mazzullo  
Director for Office Hazardous Materials Standards  
US Dot-Rspa (DHM)  
400 7<sup>th</sup> St. South West  
Washington D.C 20590-0001

Ref: Hazardous Materials Registration Program

Could you please advise me if I have to register as I am getting many different answers. Talking to someone in your office he advised he didn't feel I had to register.

I have nothing to do with shipping my material. I call the order in to my supplier who then ships order out and then I invoice the customer. Please advise. Thank you.

Regards

*Robert Keel*  
Robert Keel