



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

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

AUG 16 2000

Mr. Stephen B. Dzialo, Sr., PE
GEM Technologies, Inc.
312 Directors Drive
Suite 600
Knoxville, TN 37923

Ref. No. 00-0200

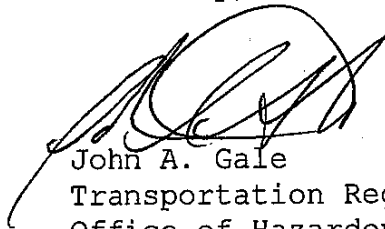
Dear Mr. Dzialo:

This is in response to your letter dated July 21, 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 in order to fabricate specification packagings authorized under Part 178, Subpart L.

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. Gale
Transportation Regulations Specialists
Office of Hazardous Materials Standards



000200

107.601

GEM TECHNOLOGIES, INC.

July 21, 2000

Mr. Edward Mazzullo
Director
Office of Hazardous Material Standards
U.S. DOT/RSPA (DHM10)
400 7th St. SW
Washington, DC 20590-0001

Subject: DOT Registration

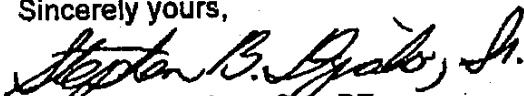
BAH
§ 107.601
Ref. No. CC-0200

Dear Mr. Mazullo,

My Company is currently investigating an initiative to manufacture and sell DOT Specification 6M packaging in accordance with the requirements of 49 CFR - Hazardous Materials Transportation. I recently contacted DOT's information resource number at 202-366-4109 who informed me that fabricators of existing DOT packaging specifications (such as 6M) are not required to register with the DOT. As packaging fabricators, we are required to comply with applicable 49 CFR requirements and certify that our products meet those requirements.

The objective of this correspondence is to obtain a formal response from your organization confirming that my company is in fact not required to register with DOT in order to fabricate existing DOT packaging specifications. Thank you for your assistance in this matter.

Sincerely yours,


Stephen B. Dzialo, Sr., PE
Vice President

sdzialo@gemserve.com