



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

MAY 4 2001

Mr. Paul J. Zinza
Manager/Instructor Dangerous Goods
Polar Air Cargo
100 Oceangate, 15th Floor
Long Beach, CA 90802

Ref. No. 01-0035

Dear Mr. Zinza:

This responds to your letter regarding the emergency response telephone number requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and the ICAO Technical Instructions for the Safe Transport of Dangerous Goods By Air. Specifically, you ask whether the emergency response telephone number may be in the form of a toll-free (e.g., "800") number. You state that U.S. toll-free telephone numbers are inaccessible from outside the United States.

As specified in § 172.604(a), a person offering a hazardous material for transportation must provide an emergency response telephone number for use in the event of an emergency involving the hazardous material. State Variation US12 in the ICAO Technical Instructions requires that for shipments to, from, within, or transiting the U.S., emergency response information including an emergency telephone number must be provided. The emergency response telephone number must include all necessary area codes needed to complete the call from within the U.S.

The use of a U.S. toll-free emergency response telephone number would satisfy these requirements. When dialed from outside the U.S., a U.S. toll-free telephone number may be accessed by contacting any U.S. operator. The procedures used to contact a U.S. operator may vary by country and calling charges may apply.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

for Edward T. Mazzullo
Director, Office of Hazardous
Materials Standards



010035

172.604



POLAR AIR CARGO

January 30, 2001

Mr. Edward T. Mazzullo, Director
Office of Hazardous Materials Standards
Research & Special Projects Administration
United States Department of Transportation
Washington, DC 20590-0001

Stevens
§ 172.604
Emergency
Response Telephone
Number
01-0035

Dear Mr. Mazzullo:

On page A3-1-15 of the *ICAO Technical Instructions* under notified state variation US 12, it clearly states: "The Transport Document required by these Instructions must include a 24-hour emergency response telephone number (including area codes and for international numbers for locations outside the U.S., the international access code and country and city codes needed to complete the call from within the U.S.) for use in the event of an incident involving the dangerous good(s). The number must be monitored at all times by a person who:

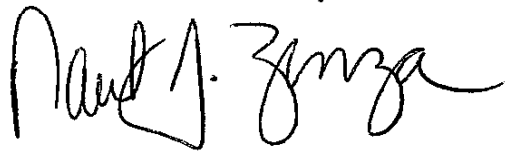
- 1) is knowledgeable of the hazards and characteristics of the dangerous good(s) being transported;
- 2) has comprehensive emergency response and accident mitigation information for the dangerous good(s); or
- 3) has immediate access to a person who possesses such knowledge and information.

Simply stated, may the above text be interpreted to preclude shippers from providing a 24-hour emergency response telephone number solely in the form of an "800" number which is thoroughly inaccessible outside the U.S. in the event of a dangerous goods incident or emergency? This question has been raised time and time again by many shippers, numerous carriers, and various dangerous goods training "schools." Your prompt official written interpretation of this issue may be sent directly to me at the following address:

Paul J. Zinza,
Manager/Instructor Dangerous Goods
Polar Air Cargo
100 Oceangate, 15th Floor
Long Beach, CA 90802

Thank you in advance for taking the time to clarify this important matter.

Sincerely;

A handwritten signature in black ink, appearing to read "Paul J. Zinza". The signature is written in a cursive style with a large initial "P" and a distinct "Z".

Paul J. Zinza
Manager/Instructor Dangerous Goods