



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

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

FEB 25 2002

Ms. Melissa Houser
Safety Specialist
Paschall Truck Lines, Inc.
P.O. Box 1889
Murray, KY 42071

Ref. No. 02-0038

Dear Ms. Houser:

This is in response to your February 5, 2002 letter requesting clarification of § 172.204 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the shipping papers given to and retained by a secondary carrier must contain the shipper's certification.

The answer is no. In accordance with § 177.817(b), the shipper is required to provide the initial highway carrier with a shipping paper that includes a signed shipper's certification. Any subsequent highway carrier that transports the same hazardous material shipment is not required to be provided with or maintain the shipper's certification; however, secondary carriers must maintain a shipping paper that otherwise conforms to Part 172, Subpart C.

I hope this satisfies your request.


Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



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172.204

BAH -
 \$172.204
 Shipping Papers 
PASCHALL TRUCK LINES, INC.

3443 Highway 641 South • P.O. Box 1889 • Murray • Kentucky 42071
 Telephone: 270-753-1717

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February 5, 2002

Ed Mazullo
 U.S. Dept of Transportation
 400th Seventh Street S.W.
 Washington D.C. 20590

Dear Sir:

I am writing to get an interpretation on the requirement for shipper's certification on Hazardous Materials loads. Our company is a truck load carrier and we have been picking up freight from Roadrunner that is a consolidated load. Roadrunner picks the freight up from the original shipper. Then they consolidate the load and print out delivery ticket from the original bills of lading. The delivery ticket is then used as the shipping document for the load we pick up. The original bills that have the shipper's certification are not given to PTL. The delivery ticket contains the proper shipping description (proper name, hazard class, UN/NA number and Packing group) and the emergency response number, but has no shipper's certification. Are we within the regulations if the only document we have on file is the delivery ticket from Roadrunner, or are we required to have on file a copy of the original bills that contain the shipper's certification?

I thank you for your help in this matter. If you require more information please call me at 270-753-1717 ext 358. The written interpretation may be faxed to me at 270-753-1730.

Sincerely,
 Paschall Truck Lines, Inc.

Melissa Houser
 Safety Specialist

We drive a fine line