



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

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

MAY 7 2003

Mr. Gene Secor
HB Fuller Company
31601 Research Park Drive
Madison Heights, MI 48071

Ref. No. 02-0234

Dear Mr. Secor:

This responds to your letter requesting clarification of the documentation requirements under the International Air Transport Association's Dangerous Goods Regulations (IATA DGR). Specifically, you ask for this office's opinion of the IATA DGR requirement to annotate the "Name and Title of Signatory" on the shipper's declaration for dangerous goods and ask whether "Shipper" or "Shipping Clerk" are acceptable titles under 8.1.6.12 of the IATA DGR. I apologize for the delay in responding.

The regulations recognized by the Department of Transportation and authorized in 49 CFR 171.11 as an alternative to compliance with 49 CFR requirements are the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO TI). Under 5.4.1.6.1 of the ICAO TI, there is no requirement to annotate a "Title" on a shipping paper in association with the certification. The ICAO TI only require that the certification be signed and dated by the shipper. Therefore, we suggest that you contact IATA directly regarding this matter at (514) 390-6770.

Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



020234

17R.204

FAX

DATE: September 5, 2002

TO: Office of Hazardous Materials Standards, DHM-10

FAX NUMBER: 202-366-3012

FROM: GENE SECOR, HB FULLER CO

PHONE: 248-526-4783

FAX: 248-585-3699

e-mail: gene.secor@hbfuller.com

PAGES INCLUDING COVER SHEET: (2)

MESSAGE:

Gentlemen: I have a question on the signatory requirements required by the Shippers Declaration for Dangerous Goods for shipments by AIR. Specifically the question surrounds the definition of "Name/Title of Signatory". The name is self-evident but the definition of "Title" is not defined, per se, anywhere in the IATA regulations, 2002 Edition. At 8.1.4.1, it simply says "The declaration form must be signed by the shipper". At 8.1.6.12 it says "Enter the name and title of the person signing the Declaration" – Title undefined.

We have recently been taken to task by Forwarders and/or carriers for not being (in their eyes) specific enough in the Title area. The personnel who actually do this work carry the Title in our organization "Shipper". We have also used the term "Shipping Clerk" in efforts to be more definitive. These folks are the last to see/check the shipment prior to it's leaving the site.

Is there something wrong with using the actual title of the person signing the document? Are forwarders/carriers imposing their own requirements in these instances even though not included in 2.9 – State and Operator Variations?

Stevens
5171.8
3172.204
Definitions/
IATA
Shipping Papers
02-0234

Your comments on the term "**TITLE**" for air shipments would be appreciated including , in the Department's opinion, whether we are complying with the regulations.

Regards,



Gene Secor
HB Fuller Company
31601 Research Park Drive
Madison Heights, MI 48071

File: DOT/Letters and fax's