



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

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

NOV 12 2002

Mr. Tom Vranesic  
Emery Forwarding  
One Emery Plaza  
Vandalia, OH 45377

Ref. No. 02-0262

Dear Mr. Vranesic:

This is in response to your letter dated September 24, 2002, requesting clarification of the requirement to place the date of acceptance on a shipping paper. Specifically, you ask if a shipping paper that includes a copy of the International Air Transport Association's (IATA's) air acceptance checklist, a checklist that contains the date of acceptance, would meet § 175.30(a)(2) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

IATA Dangerous Goods Regulations do not have official standing under the HMR. The requirement found in § 175.30(a)(2) states that each shipping paper must include the date of acceptance by the initial carrier. Provided your shipping paper conforms to the requirements of Part 172, Subpart C, including the requirements for continuation pages found in § 172.201(c), the air acceptance checklist portion you describe will fulfill the date of acceptance requirement contained in § 175.30(a)(2).

I hope this satisfies your inquiry. If we can be of further assistance, please contact us.

Sincerely,

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



020262

175.30



September 24, 2002

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

BAH  
§175.30  
Shipping Papers  
02-0262

Dear Mr. Billings,

I'm writing to you seeking clarification of the "date of acceptance" component of the revisions to 49CFR 175.30(a)(2). As a forwarder primarily accepting dangerous goods shipments for air transport under IATA/ICAO, our current method of recording date of acceptance is to attach a copy of the air acceptance checklist, which we consider part of the shipping paper, to the Shipper's Declaration. Each checklist is dated with the actual date of acceptance and accompanies the shipment throughout the transportation cycle.

Some carriers have indicated that the date of acceptance must be recorded on the Shipper's Declaration, in the Additional Handling Information section. Per IATA Dangerous Goods Regulations, the only entries permitted in this section are entries relating to the handling of the shipment. Additionally, entries in this section must only be made by the shipper.

Please advise if our current method satisfies the intent of the regulation and is sufficient to comply with the regulation. If not, please advise alternative methods for satisfying the requirements while still complying with IATA regulations.

Sincerely,

Tom Vranesic  
Senior Analyst, Dangerous Goods