



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

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

OCT 22 2004

Mr. Michael Gilgenbach
Packaging Corporation of America
Technical and Development Center
2150 South Shaddle Avenue
Mundelein, IL 60060

Ref. No. 04-0170

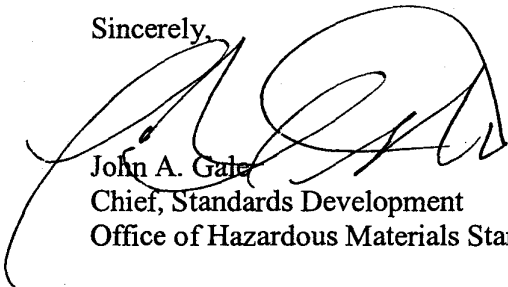
Dear Mr. Gilgenbach:

This responds to your July 13, 2004 letter requesting clarification on the proper use of a package manufacturer's symbol or "M" number when marking UN specification packagings under 178.503(a) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether your company, which produces corrugated boxes, an approval agency certifying compliance (e.g., third party testing facility), or a customer is required to have a symbol or "M" number.

If your company does not accept responsibility for certifying a packaging and provides packagings to your customer who does accept responsibility for certifying the packaging, your company does not need an "M" number.

I hope this answers your inquiry.

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



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Marking of Packagings
04-0170



July 13, 2004

Mr. Ed Mazzullo
Director, Office of Hazardous Materials Standard
U.S. DOT/RSPA (DHM-10)
400 7th Street SW
Washington, DC 20590-001

Dear Mr. Mazzullo:

I need to know the proper use of M numbers. I work for a company that produces corrugated boxes. Some of which are used for shipping hazardous materials. We do not certify the packages. It is done by third party labs. Should this third party lab have an M number? Should we have an M number? If our customer is the Certifier of Record, should they have an M number? We are never considered the "Manufacturer" would we need an M number?

You may e-mail me at mgilgenbach@packagingcorp.com or fax a response to 847-482-2100.

Thank you for your help.

Sincerely,

Michael Gilgenbach
Michael Gilgenbach