



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

FEB 28 2005

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

Ms. April Chance  
Manager, Radiological Affairs  
Tyco Healthcare/Mallinckrodt  
675 McDonald Blvd  
Hazzelwood, MO 63042

Ref. No. 05-0005

Dear Ms. Chance:

This is in response to your letter dated January 5, 2005, regarding the shipper's certification prescribed in § 172.204 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you request clarification on the signature requirement in § 172.204(d). Your questions are paraphrased and answered below.

Q1: Is it acceptable to use a rubber stamped name with an adjacent signature or initials to fulfill the signature requirements in § 172.204(d)?

A1: The answer is yes. The certification must be legibly signed by a principal, officer, partner, or employee of the shipper or his agent; and (2) may be legibly signed manually, by typewriter, or by other mechanical means. The use of a rubber stamp to produce a signature would satisfy this requirement.

Q2: Is it acceptable to use a signature page that cross-references printed names with signatures, which would remain at the facility (i.e. would not accompany the shipping paper), to fulfill the shipping paper requirements in § 172.204(d)?

A2: The answer is no. By providing a certified shipping paper the person who offers a hazardous material for transportation certifies that the material is offered for transportation in accordance with the HMR. The required shipping paper must contain the shipping description, a certification statement (see § 172.204(a)(1) or (a)(2)), and an authorized signature (see A1).

I hope this satisfies your request.

Sincerely,

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



050005

172.204(d)

**tyco**

Healthcare

**Mallinckrodt**

Mallinckrodt Inc.  
675 McDonnell Boulevard  
P.O. Box 5840  
St. Louis, MO 63134

Tele: 314 654-2000  
www.mallinckrodt.com

January 5, 2005

BAH  
§ 172.204 (d)  
Shipping Papers  
05-0005

U.S. Department of Transportation  
Office of Hazardous Materials Standards  
Research and Special Programs Administration  
Attn: DHM-10  
400 7<sup>th</sup> Street SW  
Washington, DC 20590-0001

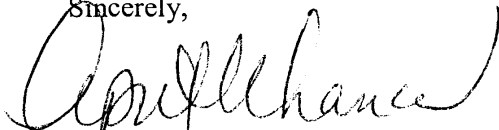
RE: Interpretation of 49 CFR §172.204(d)

To Whom It May Concern:

Pursuant to the provisions of 49 CFR §105.20(a), I am requesting an interpretation of the requirement for a legible signature on the shipping paper, found in §172.204(d). I would also like to propose two methods for achieving compliance. First, a signature page that cross references printed names with signatures. This page would stay at the facility, i.e., would not accompany the shipping paper. The second alternative is a rubber stamped name with adjacent signature or initials.

Thank you in advance for your prompt attention in this matter. If you have questions, please do not hesitate to contact me at (314) 654-7960 or (314) 267-9140.

Sincerely,



April C. Chance, CHP  
Manager, Radiological Affairs  
Tyco Healthcare/Mallinckrodt

cc: K. Yoder