



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

JUN 25 2008

Mr. John H. Hawn
P.O. Box 124
Dunlap, IA 51529-0124

Ref. No. 08-0160

Dear Mr. Hawn:

This responds to your May 12, 2008 letter requesting clarification on the registration requirements in 49 CFR Part 107, Subpart G. Specifically, you ask if you must register and pay a registration fee.

According to your letter, you are a gas distributor for Sinclair. Your dealers order fuel, which is delivered to them by Sinclair in Sinclair's trucks. The gas delivery is billed to you and you collect payment from the dealers. You do not own gas stations nor do you operate the motor vehicles that deliver gas.

In accordance with 49 CFR 107.601, shippers and carriers of certain quantities of hazardous materials must register with the Pipeline and Hazardous Materials Safety Administration and pay a registration fee. Because you are neither a shipper nor a carrier, based on the information provided in your letter, it is the opinion of this Office that you are not subject to the registration requirements.

I hope this answers your inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Gorsky".

Susan Gorsky
Regulations Officer
Office of Hazardous Materials Standards

To Edward Mazzuolo
Boothe
3171.1
Applicability
08-0160

Dear Sir

My Name is John H
Hann, I have been in the
gas business for 57 years I am
78 years old. I have no Trucks
or own any Stations. I am
a Sinclair Distributor for Sinclair.
My Dealers order there own Fuel
it is delivered to them by Sinclair
in there own Trucks It is billed to
me and I collect from the Dealers
I dont think that I owe for
this Hazardous Materials Certificate
Thank you Let me know if
I do,
Jack H.