



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

AUG 24 2016

Mr. Kerry Fitzgerald  
Renaldo Sales & Service, Inc.  
P.O. Box 820  
North Collins, NY 14111

Reference No. 16-0114

Dear Mr. Fitzgerald:

This letter is in response to your June 10, 2016, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to whether a mechanical signature is permitted on documents that are issued for vehicle reporting and recordkeeping. Specifically, you ask whether it is permissible to use a "rubber stamp" or "digital" signature on test or inspection reports required in § 180.417(b)(2)(x), rather than a handwritten signature.

The answer is yes. Except in specific instances stipulating that a signature must be handwritten or as permitted under § 172.204(d), the HMR do not specify the methods that may be used to execute prescribed signatures. It is the opinion of this Office that, except in those instances where the HMR require a handwritten or other specific type of signature, the signature methods permitted in § 172.204(d) may be used to execute signatures required under the HMR provided the signature is legible and verifiable. Therefore, it is permissible to use rubber stamped and digital signatures that fulfill these conditions when completing the test or inspection reports required in § 180.417(b).

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster  
Chief, Regulatory Review and Reinvention  
Standards and Rulemaking Division

Edmonson  
180.417(b)(2)(X)  
Reporting and Record Retention Reg  
16-0114

**Goodall, Shante CTR (PHMSA)**

**From:** Rivera, Jordan CTR (PHMSA)  
**Sent:** Tuesday, June 28, 2016 2:53 PM  
**To:** Hazmat Interps  
**Subject:** FW: Hazmat Information Center Feedback: Highway (Sections 177.800 &ndash; 177.870)

Hi Shante/Alice,

Please submit this as a letter of interpretation. Kerry Fitzgerald spoke with Eamonn in the Info Center.

Please let me know if you have any questions.

Thanks,  
Jordan

**From:** PHMSA Webmaster  
**Sent:** Friday, June 10, 2016 1:13 PM  
**To:** PHMSA HM InfoCenter; PHMSA Webmaster  
**Subject:** Hazmat Information Center Feedback: Highway (Sections 177.800 &ndash; 177.870)

**Hazmat Information Center Feedback: FW**

**Name:** Kerry Fitzgerald

**Organization:** Renaldo Sales & Service, Inc.

**Street:** PO Box 820

**City:** North Collins

**State:** New York

**Country:**

**Zip:** 14111

**Email:** [kerry.fitzgerald@renaldo.org](mailto:kerry.fitzgerald@renaldo.org)

**Phone:** 716-337-3760

**Fax Number:**

**Topic:** Hazmat Information Center Feedback:  
Highway (Sections 177.800 – 177.870)

**Question/Comment/Details:** Is it permissible to use a "rubber stamp" or "digital" signature on reports/records that are required in 180.417 (b)(2)(x), rather than a handwritten signature? Such signatures are allowed in 172.204 (d) for shipping papers. It would streamline the record keeping process if signatures could be digitized. If an official interpretation is necessary for this inquiry, let this email suffice for such a request. Thank you