

Mr. J. F. Pfrank
Vice President Operations
Pipe Line Service Company
3240 North Mannheim Road
Franklin Park, Illinois 60131

Dear Mr. Pfrank:

This is in response to your letter of November 7, 1972, concerning the marking requirements for gas pipe as set forth in 49 CFR §192.63. You recommend that the standards for marking be amended to eliminate weight per foot and replace it with the wall thickness.

Section 192.63 does not in itself state a requirement that pipe be marked to show weight per foot. Rather, that regulation requires that the pipe be marked as prescribed in the specification or standard to which it was manufactured. Thus, for example, marking on pipe manufactured to API 5L or 5LX would be required to show weight per foot. In such cases, however, the manufacturer's pipe tables would provide a ready cross-reference showing wall thickness.

It is recognized that for your purposes wall thickness may be more meaningful than weight per foot. However, for other persons such as shippers, the weight per foot may be more use.

Inasmuch as marking requirements for weight per foot follow industry-developed standards and serve a useful purpose, and since information on wall thickness is readily available, there does not appear to be a basis at this time for substituting wall thickness for weight per foot as a regulatory matter.

Your comments stating your position will be retained and reviewed, along with all other relevant material, at such time in the future as any amendments are considered for §192.63.

Sincerely,

/signed/

Joseph C. Caldwell
Director

Office of Pipeline Safety