

August 10, 1973

Mr. R. W. Schneider
Vice President - Engineering
Bonney Forge Division
Gulf + Western Manufacturing Company
Allentown, Pennsylvania 18105

Dear Mr. Schneider:

In your letter of July 5, 1973, you asked for clarification concerning the use of the word "prototype" in Sections 192.149 and 192.505(d)(2) of Part 192, Title 49, Code of Federal Regulations.

Our use of the word "prototype" in these Sections means the original pattern on which all similar subsequent fittings of the same kind and size are based. In the case of bursting strength requirements for a particular fitting made in accordance with certain design specifications, size, material properties, and manufacturing process, such a new fitting would be tested to burst. After satisfactory test, any number of like fittings would be expected to meet strength requirements for such a type fitting.

If there is a change in size, material, design specifications, manufacturing process, or any other thing that could affect the performance, it would be expected that such a change would necessitate the testing of a new prototype.

I trust this satisfactorily answers your question as to what constitutes a "prototype."

Sincerely,

Signed: De Leon

Joseph C. Caldwell
Director
Office of Pipeline Safety