

Mr. John S. Searcy, Director
Engineer Division
Tennessee Public Service Commission
Cordell Hull Building
Nashville, Tennessee 37129

Dear Mr. Searcy:

This responds to your letter of February 20, 1975, asking whether the incorporation by reference of MSS-SP-25 in 49 CFR 192.63 includes the document MSS-SP-63 to the extent that it is incorporated by reference in Section 18 of MSS-SP-25.

The reference to MSS-SP-63 in Section 18 of MSS-SP-25 incorporates a portion of MSS-SP-63 essential to the basic document MSS-SP-25. To the extent that MSS-SP-63 is incorporated by reference in MSS-SP-25, it is also incorporated in 49 CFR 192.63.

Sincerely,

/Signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety

Mr. Joseph Caldwell
Dept. of Transportation
Office of Pipeline Safety
2100 2nd Street, SW
Washington, D. C. 20590

Dear Mr. Caldwell:

Regulation 192.63(a) states that "Except as provide in paragraph(d) ... each valve, fitting, length of pipe, and other component must be marked as prescribed in-(1) The specification to which it was manufactured; or (2) MSS...SP-25."

Section 18 of MSS SP-25 states "Fittings for use in gas transmission and distribution system...(18.1) Markings for these fittings shall be those shown in MSS SP-63."

192.63 does not specifically reference MMS SP-63, which, from the title, applies only to high strength wrought welding fittings. It is a correct interpretation that MSS SP-63 is not automatically incorporated, and that MSS SP-25, not MSS SP-63, would govern the marking of fittings for use in gas transmission and distribution?

Sincerely,

John S. Searcy, Director
Engineering Division