

Mr. David Mitchell
Director
Airborne Environmental Surveys
Suite 108
3130 Skyway Drive
Santa Maria, CA 93455

Dear Mr. Mitchell:

I am responding to your letter dated October 11, 1991, concerning inspections under 49 CFR 192.463(a) and 192.465(b) and (c) of rectifiers or other impressed current power sources. You asked if electronic data collection by airborne remote sensing technique is an acceptable means of inspection under that rule.

The rule does not prescribe a means of inspection. Therefore, an operator has the freedom to conduct its inspections utilizing whatever appropriate technology or means it chooses.

The acceptability of electronic data collection by airborne remote sensing technique would depend on the capability of this means to meet the purpose of §§192.463(a) and 192.465(b) and (c). It would also depend on the reliability of the data transmitted to operators. These are matters that Federal and State field inspectors would determine when conducting an inspection and reviewing this relevant data.

Sincerely,

Cesar De Leon
Director of Pipeline Safety
Regulatory Programs