



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington, DC 20590

OCT 03 2012

Mr. Dave Madsen
Hazardous Material Analyst
Autoliv ASP, Inc.
Ogden Assembly Facility
1000 West 3300 South
Ogden, UT 84401

Reference No. 12-0153

Dear Mr. Madsen:

This is in response to your July 13, 2012 letter and August 3, 2012 telephone conversation with a member of my staff concerning the CLASS 9 miscellaneous hazard class warning label. Specifically, you ask whether the dotted line that appears as the outer border of the label's image in § 172.446 may be replaced with a solid black line under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

The answer is yes. The HMR requires a dotted or solid line printed as the outer border of a hazard warning label prescribed in 49 CFR Part 172, Subpart E, if the label is printed on or affixed to a background of similar color (see § 172.406(d)). However, please note that under the HMR, the dotted line border that is shown on all hazard warning labels prescribed in 49 CFR Part 172, Subpart E, is not a part of the label's specification unless it is used as an alternative for the solid line outer border in the manner prescribed in § 172.406(d) (see § 172.407(b)(2)).

I hope this satisfies your request.

Sincerely,

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

Autoliv

Edmonson
§172.407(b)(2)
Labeling
12-0153

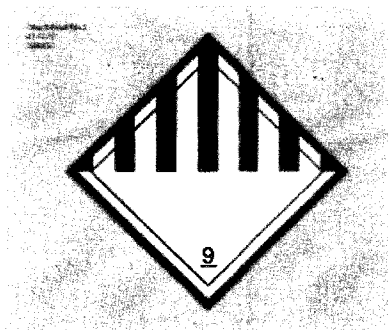
July 13, 2012

Mr. Charles Betts
Director, Standards & Rulemaking
US DOT – PHMSA
East Building – 2nd Floor
1200 New Jersey Ave. SE
Washington, DC 20590

Subject: **Request for Interpretation – Hazardous Label Outer Border**

Dear Mr. Betts,

The question has come up as to whether or not a solid black line around a hazard label is allowed as long as it is not part of the overall dimensions of the label. §172.407(b)(2) states; "The dotted line border shown on each label is not part of the label specification..." If the dotted line is not part of the label then a solid line should also be allowed as long as it is not part of the label. The solid black border for our printers is necessary to account for possible slippage that may occur during the printing process. The label shown below is 100 mm X 100 mm from the ID of the outer black line. The black line is just a border and is not part of the label dimensions. Is this acceptable?



Thank you in advance for your help and cooperation in this most important matter. If you have any questions please feel free to contact me at (801)-612-5665, fax (801)-625-7566 or by email at: dave.madsen@autoliv.com.

Sincerely Yours,



Dave Madsen
Hazardous Material Analyst

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