



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

APR 1 - 2002

Ms. Becky Webber
ADD South
5790 S Semoran Blvd
Orlando, FL 32822

Ref. No. 02-0059

Dear Ms. Webber:

This is in response to your October 22, 2001 letter concerning shipping paper requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). We apologize for the delay in responding to your letter due to mail delivery problems many Federal agencies have been experiencing due to screening and decontamination precautions.

Specifically, you ask if using bold print on the shipping paper meets the requirements of using a contrasting color when entering hazardous material descriptions on a shipping paper along with a material not subject to the HMR.

Bold print is not considered a contrasting color. If a facility does not have access to color printing capabilities, § 172.201(a)(1) includes other options to distinguish the hazardous material entry on a shipping paper. These options include entering the hazardous material first on the shipping paper or including a column captioned "HM" (for Hazardous Material) and placing an "X" in the column for the hazardous material entries.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



020059

172.201



Johnson
§ 172.201(a)(1)(ii)
Shipping Papers
02-0059

October 22, 2001

Ms. Hattie L Mitchell
Chief of Regulatory Review and Reinvention
400 7th St. SW
Room 8422
Washington, DC 20590

Dear Ms. Mitchell,

We are a software provider to the petroleum industry. About ten years ago when our company first began printing Hazardous Materials Messages on shipping documents, we implemented the printing of these messages using bold print as the "contrasting color" because none of our customers had color printers. Printing in a contrasting color was really not an option in their environment.

One of our customers recently told us that according to the DOT Regional Office in Baltimore, bold print was not an accepted "contrasting color". I am writing to you for an official ruling on this, as I'm told you are the one who makes the rules and the DOT just enforces them. Years ago, the ruling was that bold print was an acceptable contrasting color.

Sincerely,

A handwritten signature in cursive script that reads "Becky Webber".

Becky Webber
ADD South
A Division of ADD Systems, Inc.
5790 S Semoran Blvd
Orlando, FL 32822