



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

APR 18 2003

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

Ms. Gail Kelly, MT (ASCP)
Laboratory Director
Mildred Mitchell Bateman Hospital
1530 Norway Avenue
Huntington, WV 25705

Ref. No. 03-0070

Dear Ms. Kelly,

This responds to your March 6, 2003 letter requesting clarification on transporting diagnostic specimens via dedicated courier under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask what constitutes a "dedicated courier" under the HMR.

According to your letter, your facility uses drivers that perform multiple duties. They transport your specimens to a local hospital, and, later that morning the drivers may transport a patient to a group home. You state that when your drivers transport specimens to local hospitals, they are dedicated to that job. You also state that you were advised by this Office that your drivers would be considered dedicated as long as they are not doing anything else when they transport your specimens.

Diagnostic specimens or biological products are excepted from the HMR when transported by private or contract motor carriers used exclusively to transport diagnostic specimens or biological products (e.g., in dedicated vehicles, mostly couriers who transport specimens for doctors, home health care providers, hospitals, etc.). Medical or clinical equipment and laboratory products may be transported aboard the same vehicle provided they are properly packaged and secured against exposure or contamination. However, in order for your vehicle to be "dedicated," patients would not be authorized to be transported in the same vehicle at the same time the specimens are being transported.

I hope this answers your inquiry.

Sincerely,

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



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Mildred Mitchell Bateman Hospital

Laboratory
1530 Norway Ave
Huntington, WV 25705

March 6, 2003

Edward Mazzullo
Director of HAZMAT Regulations

Dear Sir,

I would like clarification of the DOT regulation governing transportation of Diagnostic Specimens by courier. The regulation specifies "dedicated courier". What constitutes a dedicated courier?

In our facility we have drivers that do multiple jobs. At 8 AM they may be taking our specimens to a local hospital and at 11AM transport one our patients to a group home. When they take are specimens they are dedicated to that job.

I spoke to Arthur today and he said that our drivers would be considered dedicated as long as they are not doing anything else when they transport our specimens. I need to have clarification in writing to attach to my file.

Our FAX # is 304-523-8362 and phone # 304-525-7801 ext 317.

Thank you.

Gail Kelly, MT(ASCP)
Laboratory Director