



March 19, 2012

Dr. Magdy El-Sibaie  
Associate Administrator for  
Hazardous Materials Safety  
Pipeline & Hazardous Materials Safety Administration  
U.S. Department of Transportation  
Washington, DC 20590

Re: Petition for rulemaking; hazardous materials transportation, emergency response information telephone number

Dear Dr. El-Sibaie:

The Dangerous Goods Advisory Council (DGAC), in accordance with §106.95 of the hazardous materials regulations (HMR), hereby petitions for amendment of 172.604(a) so that only numeric telephone numbers may be used. This change would prohibit the use of alphanumeric numbers. We believe this change to be in the interest of safety.

### INTRODUCTION

DGAC is a non-profit educational organization that promotes hazmat transportation safety by providing classroom training, seminars and conferences, and participation in domestic and international regulatory activities in its promotion of not only safe, but also efficient transportation of hazardous materials/dangerous goods in commerce.

### BACKGROUND AND JUSTIFICATION

The requirement for an emergency response telephone number in 172.604(a) does not currently limit telephone numbers that may be provided to ones consisting only of numbers. Consequently, it is the experience of some DGAC members that some shippers provide alphanumeric telephone numbers.

While telephones historically associated letters with integers on the telephone face, many telephone faces no longer do so. As a result, provision of emergency response telephone numbers in alphanumeric form has the potential for introducing delays in acquiring emergency response information, since the emergency responder must first convert each letter to a corresponding number. Such delays are undesirable.

In an April 2004 interpretation (#04-0032), PHMSA confirmed that alphanumeric numbers were allowed but also acknowledged the need to address concerns raised by the incoming letter. Those concerns mirror our own.

PETITION

To address our concerns, we petition PHMSA to amend 172.604(a) to read as follows:

“A person who offers a hazardous material for transportation must provide a numeric emergency response telephone number, including the area code, for use in the event of an emergency involving the hazardous material. For telephone numbers outside the United States, the international access code or the “+” (plus) sign, country code, and city code, as appropriate, must be included. The telephone number must be—“

As part of this petition, we ask for a two year implementation period so that programs for electronic shipping papers can be revised in an orderly manner.

Please contact me directly if you have any questions on this petition for rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read 'VAUGHN ARTHUR', with a long horizontal flourish extending to the right.

Vaughn Arthur  
President