



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

SEP 27 2004

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

Ms. Genette Fields-Smith
Air Products and Chemicals, Inc.
7201 Hamilton Boulevard
Allentown, PA 18195-1501

Ref. No. 04-0207

Dear Ms. Fields-Smith:

This is in response to your September 3, 2004 letter requesting clarification of the shipping paper requirements contained in §§ 172.201 and 177.817(e) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if you may use on-board vehicle computing devices to maintain electronic versions of shipping papers, in place of hard copies of shipping papers, while in transit.

The answer is no. Electronic versions of the shipping papers, including those in devices that allow viewing on a computer screen or printing of a paper copy, are not acceptable as shipping papers while in transportation. When in transportation, a shipping paper must be legible and printed (manually or mechanically) in English (§ 172.201(a)(2)).

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



040207

§172.201
§177.817(e)(2)

9/2/07



BAH
§172.201
§177.817(e)(2)
Shipping Papers
04-0207

Air Products and Chemicals, Inc.
7201 Hamilton Boulevard
Allentown, PA 18195-1501
Telephone (610) 481-4911

Edward T. Mazullo, Director
Office of Hazardous Materials Standards
US DOT/RSPA (DHM-10)
400 7th Street SW
Washington, DC 20590-0001

RE: Request for Written Interpretation Regarding Shipping Paper Preparation and Accessibility - 49 CFR 172.201 and 177.817(e)(2)

Dear Mr. Mazullo:

Currently, Air Products and Chemicals' commercial motor vehicle operators use automatic on-board computing devices to satisfy 49 CFR requirements. A new generation of the device is under construction and if permitted by the regulation, the device would have the following capabilities:

- a. Display required shipping paper information as listed in 172.201;
- b. Readily available and recognizable in the event of an accident or inspection;
- c. Within the drivers immediate reach while he is restrained by the lap belt;
- d. Readily visible to a person entering the driver compartment; and
- e. Placed on the driver's seat in the vehicle when the driver is not at the vehicle's controls.

Are companies prohibited from using an automatic on-board computing device (in lieu of the hard copy shipping paper) when meeting the requirements of 172.201 and 177.817(e)(2)?

As project completion quickly approaches, your expeditious response for a written interpretation is necessary and greatly appreciated. You may contact me at 610.481.7754 if you have questions.

Respectfully,

Geneite Fields-Smith
Regulatory Specialist
Air Products and Chemicals, Inc