



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

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

JAN 7 2000

Ms. Beatrice M. Lutz  
Manager, Hazardous Materials  
Transportation Compliance  
Trans World Airlines, Inc.  
Lambert-St. Louis, MO 63145-0007

Ref. No. 99-0321

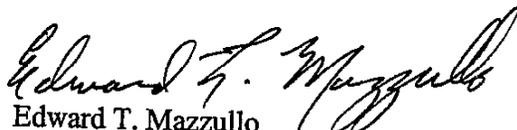
Dear Ms. Lutz,

This is in response to your letter of December 2, 1999 regarding 49 CFR 175.25(a)(4), which states, "Notwithstanding the requirements of paragraph (a)(1) of this section, a notice with the wording 'A violation can result in penalties of up to \$25,000 and five years' imprisonment. (49 U.S.C. 1809)' may be used through December 31, 2001."

The intent of § 175.25(a)(4) is to allow signs that were in compliance with § 175.25 prior to the amendments made at 63 FR 37642 on July 10, 1998, to be used until December 31, 2001. For example, signs that include the wording, "up to 75 ounces total" would still be in compliance until December 31, 2001 even though the amended § 175.25(a)(1) specifies "up to 70 ounces total". However, in adopting § 175.25(a)(4), we failed to include reference to the change in § 175.25(a)(1) with respect to small quantities of medicinal and toilet articles carried in luggage. In the near future, RSPA will modify this section to clarify our intent.

This response has been coordinated with the Federal Aviation Administration's Office of Civil Aviation Security. If we can be of further assistance, please contact us.

Sincerely,

  
Edward T. Mazzullo  
Director, Office of Hazardous  
Materials Standards



990321

175.25

**HAZARDOUS MATERIAL TRANSPORTATION COMPLIANCE**  
Lambert-St. Louis International Airport - P. O. Box 10007 - St. Louis, MO 63145-0007  
Telephone: (314) 253-6142 FAX: (314) 253-6109

December 2, 1999

Mr. Fritz Wybenga  
U. S. Department of Transportation  
Washington, D. C.

Fritz:

Pursuant to our conversation this morning, I would certainly appreciate an interpretation concerning 49CFR 175.25 (a) (4).

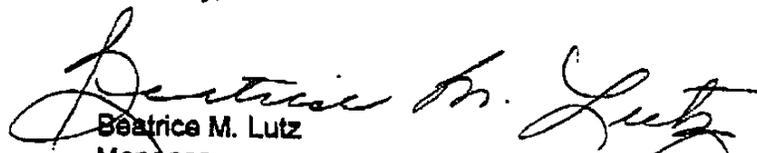
Although 175 (a)(4) references (a)(1), it cites specifically "A violation can result in penalties of up to \$25,000 and five years' imprisonment. (49 U.S.C. 1809)" may be used through December 31, 2001.

It was our understanding that this reference covered the present signage in its' entirety and gave all passenger carriers until 12/31/2001 to replace the passenger signs.

Fritz can you please give us an interpretation on this section? In particular, is the entire sign "grandfathered" or just the verbiage cited in 49CFR 175.25 (a)(4).

As always, I certainly appreciate your assistance with this problem

Sincerely,

  
Beatrice M. Lutz  
Manager,  
Hazardous Materials Transportation Compliance

SHANE PLS PREPARE QUICK  
RESPONSE FOR ED'S SIGNATURE  
FRITZ