



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

JUL 27 1999

Mr. Aaron Moran
Shipping Manager
Conley Corporation
2795 East 91st Street
Tulsa, OK 74137

Ref. No. 99-0111

Dear Mr. Moran:

This is in response to your letter dated April 29, 1999. Specifically, you ask how § 172.201 (c) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) relates to the International Civil Air Organization's Technical Instructions For The Safe Transport of Dangerous Goods By Air (ICAO Technical Instructions).

Section 172.201 (c) requires shipping papers that consist of more than one page to be consecutively numbered, and the first page must bear a notation of the total number of pages. Section 171.11 of the HMR authorizes the use of the ICAO Technical Instructions in lieu of the HMR for packaging, marking, labeling, classifying, and describing and certifying on a shipping paper hazardous materials which are transported by air.

The ICAO Technical Instructions do not contain a requirement for notations on shipping papers that consist of more than one page. Commercial enterprises that wish to impose additional requirements for transporting hazardous materials, such as numbering requirements on shipping papers being shipped under the provisions of the ICAO Technical Instructions are not precluded from doing so. The International Air Transportation Association Dangerous Goods Regulations (IATA) are intended for industry guidance among association members and are not official regulations.

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

Sincerely,

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



990111

172.201

Attention Edward Mazzullo FAX: 202-366-3012

Company: Conley Corporation

Address: 2795 E. 91st St. Tulsa, OK 74137

Phone : 918-299-5054

Fax : 918-299-5907

Stevens

§ 172.201

99-0111

Please define regulation 172.201(c) in regards to applicablility concerning IATA. The regulation stated within IATA refers to the fact that the shipping declaration must state one of one and not be listed as a continuation page. They have refused shipments listed as continuation pages.

Sincerely,

Aaron R. Moran/Shipping Manager

