



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

SEP 15 1999

Mr. Michael D. Brewster
Lockheed Martin Missiles & Space
Post Office Box 3504
Sunnyvale, CA 94088-3504

Ref. No. 99-0117

Dear Mr. Brewster:

This is in response to your letter dated May 5, 1999, requesting clarification of marking requirements under § 178.3 (a)(2) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask whether it is permissible to list the manufacturer's name and the Commercial and Government Entity (CAGE) code (i.e., the five digit manufacturer's identification number assigned by the Defense Logistics Agency) in lieu of the actual address. You also ask if the CAGE code can be registered as a symbol, and the proper procedure to register the code with the Department of Transportation (DOT).

It is not permissible to list the CAGE code in lieu of the actual manufacturer's address. However, you may request a symbol (i.e., an "M" number) from DOT. You may not register a CAGE code as a symbol. The M number is marked on the packaging in lieu of the manufacturer's name and address. The CAGE code may then be marked on the packaging after the M number, if desired. Requests for a symbol may be submitted to the Office of Hazardous Materials Exemptions and Approvals, DHM-30, Attention: Linda Cooper, Research and Special Programs Administration, 400 7th Street, S.W., Washington, DC 20590-0001 or telefax 202-366-3753. The length of time to process a request and issue an "M" number generally is two to three weeks, depending on the number of requests being processed. If emergency processing is required, please indicate that in your request.

I hope this answers your inquiry.

Sincerely,

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



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Associate Administrator For Hazardous Materials Safety
DHM-1400 7th Street, S.W.
Washington, D.C. 20590-0001

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Gentlemen:

A question has arisen concerning CFR 49 section 178.3 (2) which I hope you will be able to answer. 178.3 (2) specifies that when identifying a packaging with POP markings it must display "the name and address or symbol of the packaging manufacturer . . .". The question is, is it permissible to list the manufacturers name and the Commercial and Government Entity (CAGE) code (i.e. the five digit manufacturers identification number assigned by the Defense Logistics Agency) in lieu of the actual address. As the address would require a great deal of stencilling it was suggested that the five digit CAGE code could be used.

If this practice is not allowed, would it be possible to have the CAGE code registered as a symbol, or would a symbol be designated by the DOT? Also, what is the proper procedure for having a symbol assigned and registered?

Thank you for your assistance in this matter and I look forward to your response.

Sincerely,

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