

U.S. Department
of Transportation

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

**Research and
Special Programs
Administration**

June 27, 1995

Mr. Terry Fronterhouse
Chief, Pipeline Safety
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Dear Mr. Fronterhouse:

We have considered your letter of May 4, 1995, notifying us that the Commission's Office of Pipeline Safety has granted Southwest Gas Corporation a waiver from 49 CFR 192.707(d)(1). This regulation requires that, except in heavily developed urban areas, the lettering on line markers must be at least 1-inch high with one-quarter inch stroke. For aboveground mains 1-inch or less in diameter, the waiver permits Southwest to use markers that conform to a sample with lettering of reduced height and stroke.

The waiver is necessary because of pipe 1-inch or less in diameter, sticker-type markers with lettering that meets § 192.707(d)(1) overlap at the edges, causing the markers to be difficult to read. In view of this problem and your conclusion that the alternative markers will not compromise safety, we have no objection to the waiver.

Sincerely,

Cesar DeLeon
Deputy Associate Administrator
for Pipeline Safety