

is also aware that managers of another municipal system in Scottsville, Kentucky, advised that they were uninformed of their responsibilities under the Act.

Thus, it is evident that forwarding such notices has, in some cases, not actually served the intended purpose of informing municipal gas system operators of their obligations under the Act.

The notices received by the municipalities consist of reprints of portions of the Federal Register. The reprints of the Federal Register do not clearly state to the uninformed recipient at the municipal level that he has incurred a responsibility. For example, the title of the reprint "Interim Minimum Federal Safety Standards for the Transportation of Natural and Other Gas by Pipeline," does not suggest that municipal systems are included. The reprint does not mention any involvement of municipalities until the middle of the third column of text. While such notices fulfill legal requirements, our concern is that the system of notification of these companies of the requirements is not effective. Truly effective notification of such regulations is required if the total system of safety control through Federal standards is to operate. Thus, effective notification is as important as the written regulations themselves.

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For these reasons, the National Transportation Safety Board recommends that the Office of Pipeline Safety contact each municipal gas system under its jurisdiction to explain clearly the requirements of the Act and previously distributed notices so that no misunderstanding exists. Such notification could be by letter, either registered or certified, to the responsible official of the city, such as the Mayor or city attorney, addressed by name. An acknowledgement from each municipality that it understands its obligations should also be considered.

In summary, it is noted that in two recent cases, municipal gas operators were not aware of their requirements under the Act. Clearly informing these municipal gas operators of the requirements of the Act, and following up to assure compliance with applicable regulations, should improve pipeline safety in the cities and communities served by these municipal systems.

Sincerely yours,



John H. Reed  
Chairman