



Commercial Vehicle Safety Alliance

promoting commercial motor vehicle safety and security

September 27, 2013

The Honorable Cynthia Quarterman
Administrator
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
East Building, 2nd Floor
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: Docket No. PHMSA-2013-0124
Paperless Hazard Communications Pilot Program

Dear Administrator Quarterman:

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments regarding the Pipeline Hazardous Materials Safety Administration (PHMSA) Notice and Request for Comments for the "Paperless Hazard Communications Pilot Program", Docket Number PHMSA-2013-024 publication date July 19, 2013.

CVSA supports PHMSA's Paperless Hazard Communication Pilot Program in order to determine the feasibility of a paperless hazards communication system. However, the enforcement community has the following comments and suggestions that we believe must be explored during the pilot study:

1. A uniform electronic system must be properly developed and managed in order to improve recognition and identification of the presence of hazardous materials. The system must not compromise the safety of law enforcement and first responders.
2. Drivers must be informed of the presence of hazardous materials and the method(s) to obtain the e-shipping paper information for an inspection or first responder.
3. All devices conveying the e-shipping paper communication must be capable of providing an inspecting officer or first responder the shipping paper information required and specified by Subpart C of part 172. The e-shipping paper must be carried in the same manner of accessibility as current regulatory requirements found in 177.817(e). During the Pilot Study the e-shipping paper must batch the paper copy being carried.
4. Added financial burden to state enforcement agencies participating in the Pilot Study. PHMSA has stated they anticipate up to an additional hour of inspection time while the inspecting officer completes a questionnaire to be submitted to PHMSA. This will also cause

a reduction in the number of CMV inspections a participating agency will conduct. PHMSA needs to find funding to provide to participating agencies to offset costs.

In closing, we appreciate the active participation of PHMSA in the activities of CVSA and working collaboratively in supporting our mission of *Promoting Commercial Motor Vehicle Safety and Security*. CVSA works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. PHMSA is an important partner in our efforts.

If you have further questions or comments, please do not hesitate to contact me by phone at 301-830-6145 or via email at stevek@cvsa.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve A. Keppler".

Stephen A. Keppler
Executive Director