August 8, 2013

Pipeline and Hazardous Materials Safety Administration
Paperless Hazard Communications Pilot Program

Docket Number: PHMSA-2013-0124

The International Associational of Fire Chiefs (IAFC) is commenting on the Paperless Hazard Communications Pilot Program regarding the safety and security impacts for emergency responders. PHMSA assessment should include the following:

Considerations

- HM information must be scalable (i.e., information should fit the intended need),
- Shipping paper information should be provided in a standard, specific format,
- Electronic information should be immediately available during an emergency response, if possible, but always accurate,
- Paperless communications should be regulated by means of a performance standard approach,
- Electronic shipping paper information should be capable of being instantaneously viewed during an inspection, and
- Electronic information should reduce inspectors' wait time.

Gaps

- There is a lack of training on available electronic tools and other approaches. This includes additional training on 49 CFR that effect emergency responders.
- Too much information can be detrimental (i.e., information other than what is required under 49 CFR, Subpart C may result in response delay). Standardize information available at the differing level of response (i.e. Awareness, Operations, Tech….. etc.).
- There are multiple trade names to one proper shipping name.
- Equipment and data are not standardized. All should be offered in current IOS and Android systems as well as systems used by AHJ agencies.
- Accessibility to receive Electronic Hazardous Materials (e-HM) information, availability of equipment and connectivity dead zones are limiters;
- Many devices for receiving e-HM information are not available.

Common HM-ACCESS Results among All Stakeholders

Common requirements for the implementation of e-shipping papers identified by shippers, carriers, emergency response providers, and law enforcement personnel are:

• Equivalent or higher level of safety to current requirements,
• Internationally harmonized and uniformed information,

• Secured from potential threats,
• Capable of allowing shippers to be responsible for data entry and error correction,
• Cost effective, and
• Able to allow e-shipping papers to be accessible through wireless capabilities.
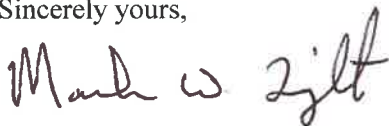
Summary

Advancements have been made in e-HM communication domestically and internationally and the HM community has invested in and implemented internal systems to meet business needs and demands of global transportation to improve e-communication and e-commerce. Some stakeholders, including the International Air Transport Association and the United Parcel Service, are in the early stages of demonstrating proof of concepts to examine the use of e-shipping papers. Further, the UN Model regulations incorporate the use of e-shipping papers. All stakeholders are taking strides to create a transportation environment that does not have e-communication boundaries, improves global harmonization, and creates performance-based systems that are striving to provide an equivalent or better level of safety to the current paper requirements.

Program implementation should not become an unfunded mandate for the first responder community. The conversion to and use of electronic shipping papers should not result in public safety incurring any additional costs for equipment, data access, connectivity, etc.

If the industry wishes to go this route to produce cost savings and efficiencies; this change in its practice should not be funded by the responders. One only needs to look back to the recent Sprint radio spectrum rebanding debacle to see how a seemingly good idea can become an absolute cost nightmare for an unsuspecting end-user.

Shipping papers format and content must meet the needs of the varying levels of responder operational knowledge and capability.

Sincerely yours,

Mark W. Light, CAE
Chief Executive Officer and Executive Director