



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 28, 2026

Kaitlyn Milam
7241 Foxtrot Drive
Orange, TX 77632

Reference No. 26-0019

Dear Ms. Milam:

This letter is in response to your February 5, 2026 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping papers. You describe a scenario where the offeror (*i.e.*, the shipper) provided a shipping paper, which listed the packaging description as a “pallet,” to a carrier that subsequently revised the packaging type on the shipping paper based on their reasoned determination that the original packaging description was not compliant and without knowledge of this action by the shipper.

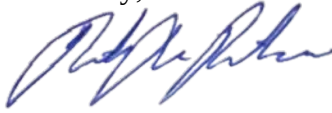
We have paraphrased and answered your questions as follows:

- Q1. Does the HMR prohibit a carrier from modifying or correcting a shipping paper that has been certified by the shipper?
- A1. No. If a carrier determines that the shipping paper contains incorrect information and the carrier has accepted the hazardous material for transportation, the shipping paper may be updated with correct information. Either the carrier can make the correction at the instruction of the shipper, or the shipper can update the shipping paper and send an electronic copy for the carrier to print out.
- Q2. Must the shipment be held until the shipper provides corrected information to the carrier for correction or reissued shipping papers?

A2. Yes. A carrier may rely on information from the shipper or a prior carrier but, as provided in 49 CFR § 171.2(f), cannot transport hazardous materials in commerce knowing that the information provided is incorrect.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dirk Der Kinderen', written in a cursive style.

Dirk Der Kinderen
Chief, Standards Development Branch
Standards and Rulemaking Division

Good afternoon,

Please see the following request for a letter of interpretation. The request is for Mr. Leslie Milam who I have talked to. His daughter Kaytlynn submitted the request on his behalf because of issues with Leslie's email. Let us know if you need anything else.

Best,

Aminah

From: kaytlynn milam <kaytlynnmilam@gmail.com>

Sent: Thursday, February 5, 2026 3:18 PM

To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>

Subject: Letter of Interpretation Request

Hello,

I am assisting my father, a CDL driver transporting hazardous materials, with a regulatory compliance question.

We are seeking clarification regarding carrier responsibilities under 49 CFR § 171.2(f) and related sections.

In this specific situation, a shipper provided a hazardous materials shipping paper certified under 49 CFR § 172.204 listing the packaging description as "pallet." Carrier personnel believed this description was not compliant and, without contacting the shipper or obtaining revised shipping papers or a new certification, unilaterally changed the packaging description on the shipping paper to "drum."

Our question is:

Does the Hazardous Materials Regulations authorize a carrier to independently modify or rewrite a shipper-certified packaging description on a hazardous materials shipping paper?

Or must the shipment be held until the offeror/shipper provides corrected information to the carrier for correction or reissued shipping papers?

Thank you for your assistance,

Kaytlynn Milam

Phone: 337-526-2254

Mailing: 7241 Foxtrot Drive, Orange, TX, 77632