



PROJECT TECHNICAL LIAISON ASSOCIATES, INC.

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August 16, 1993

Federal Highway Administration
Office of the Chief Counsel
400 Seventh Street, SW
Room 4231HCC-10
Washington, DC 20590

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LEOS/REGS. DIV.
ADHOC

FHWA-97-2180-47

Re: FHWA DOCKET NO, MC92-4

Dear Sir

The proposed change to (49 CFR Part 397) has been reviewed. Our **primary comment** is that LNG appears to have been singled out as a particularly hazardous fuel. **It is not.** If this proposed regulation is cost effective for LNG, then it would be even more cost effective for gasoline and propane, Until it can be shown that LNG is **more** hazardous than these other **fuels**, it **should** not be burdened with additional regulation. If one examines the **experience record**, one must conclude that gasoline and propane are **more** hazardous and should have such extra precautions **before** LNG.

This proposal (relative to LNG) appears to have no justification in **the science or experience**. Analogous to "if it is not broke, don't fix it", we **suggest** that "if it is not a problem, don't regulate it", LNG trucking has not been a problem.

Furthermore, we as a country don't need anymore unnecessary **regulation**

Thank you,

James P. Lewis
President

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