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DEPT. OF TRANSPORTATION

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TO: Charles Medalen, FMCSA Counsel

FROM: Cy Malloy *cy*

DATE: 12/18/00

On behalf of my client, the American Concrete Pipe Association (ACPA), we file the following comments on the Dec. 18, 2000 proposed cargo securement regulations:

**Correct Language-**

Final comments ACPA filed with Larry Minor, FMCSA, on April 21, 2000 regarding the inaccuracy in Section 3.5.5.2: It should be:

"If one chain is used over the top of the pipe load, it shall be a ½" chain, with the option of two chains at 3/8" strength."

**Incorrect FR Language:**

12/18/00 New Language, Section V(A):

- (A) Two indirect tiedowns must be placed longitudinally over the group of pipes;

[Both Sean Mc Alister and Pearson, Canadian leaders on CVSA's Tiedown Committee, agree with our April language, which was in the draft form of the proposed regulation. This language is what was agreed on with FMCSA and our U. S. and Canadian concrete pipe manufacturers and associations].

Please make this correction in the final version of this regulation.