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Dockets Management System
US. Department of Transportation
400 Seventh St. SW
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Re: **Docket Number RSPA-2002-13658 (HM-215) – 172.202(a)(5)**

Dear Sir or Madam:

I am writing to comment on a portion of HM-215E – specifically 172.202(a)(5).

TRW has no problems complying with the changes proposed to 172.202(a)(5), but we do ask for clarification of the requirement that "For cylinders for Class 2 materials and bulk packagings, indication of the total quantity must be shown (for example, '10 cylinders', '2 IBCs', or '1 cargo tank')."

However, when taken in context with the next sentence ("The number of packages and types of packages...must also be indicated."), it begs the question of airbag inflators which are also considered to be cylinders, and modules which contain inflators/cylinders. These products (some of which remain as class 2 materials) are required to be contained in strong outer packaging, and as such the number of cylinders in the shipment is not the issue - it would be the number of packages containing the product.

Therefore, TRW would request that the language of 172.202(a)(5) be clarified to reference UNPACKAGED cylinders ("For unpackaged cylinders for class 2 materials....").

Thank you for the opportunity to comment on this NPRM.

Sincerely,

Julie Smith

Julie Smith
Program Manager,
Cylinder Regulatory Compliance

(HM-215E Comments – 172.202.doc)