



October 24, 2022

Mr. William Schoonover  
Associate Administrator  
Hazardous Materials Safety  
Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Avenue, SW  
Washington, DC 20590  
Docket Number: PHMSA-2022-0043

**RE: The Department of Transportation's (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) Request for Information on Electronic Hazard Communication Alternatives; ACA Comments**

Dear Mr. Schoonover:

The American Coatings Association (ACA) submits the following comments to the Department of Transportation's (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding its request for information on electronic hazard communication alternatives. ACA is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory, and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services. ACA appreciates the opportunity to comment and looks forward to working with PHMSA as it develops possible electronic hazard communication alternatives.

ACA supports PHMSA's effort to provide a viable alternative to hard copies of shipping papers, while still maintaining an equivalent level of safety and providing shippers, carriers, enforcement personnel, and emergency responders the necessary information about the hazardous materials being transported. ACA believes that an electronic alternative would provide for a more efficient and effective means to exchange information between shippers and transporters, especially in multi-modal operations.

The information transmitted in an alternative system should be consistent between various shippers and transporters, which would maintain the current information requirements on hard copy shipping documents. This would ensure that enforcement personnel and emergency responders would only need to understand one format and not be required to decipher various formats that may be used if non-uniform systems were to be used. An electronic system should also be required to provide emergency response information to emergency responders and ensure that shipper emergency contact information continues to be transmitted.

In addition, any system developed must be able to transmit the required information within a short period of time (e.g., electronic transmission, text messages, emails).

Lastly, ACA believes that hard copy shipping documents should continue to be allowed. Such an allowance would minimize impacts and costs to small shippers and transporters.

Overall, ACA supports PHMSA's effort to provide possible electronic hazard communication alternatives and looks forward to working with the agency as it continues to work on this important initiative. Thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions or require additional clarification.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhett Cash". The signature is fluid and cursive, with the first name "Rhett" and last name "Cash" clearly distinguishable.

Rhett Cash  
Counsel, Government Affairs

*\*\*Submitted via Regulations.gov\*\**