



September 21, 2009

DOT Docket Management System: U.S. Department of Transportation
Docket Operations, M-30
Room W12-140, West Building, Ground Floor
1200 New Jersey Avenue, S.E.
Washington, DC 20590-0001

VIA FEDERAL E-RULEMAKING PORTAL (www.regulations.gov)

Re: Docket No. PHMSA-2008-0301: *Pipeline Safety: Updates of Regulatory References to Technical Standards and Miscellaneous Edits*

Good afternoon:

Pursuant to the notice of proposed rulemaking (“Proposed Rule”) issued in the referenced docket by the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) on July 21, 2009, and published in the July 22, 2009, issue of the *Federal Register*,¹ the Interstate Natural Gas Association of America (“INGAA”) submits the following comments.

INGAA is a non-profit trade association that represents the interstate natural gas transmission pipeline industry. INGAA’s members operate over two thirds of the nation’s natural gas transmission pipeline mileage and represent almost one quarter of the natural gas transmission pipeline entities reporting to PHMSA. Their interest in the Proposed Rule is self-evident.

INGAA supports the changes that would be made to 49 C.F.R. Part 192 (“Part 192”) under the Proposed Rule. In the Proposed Rule’s preamble, PHMSA noted that its Office of Pipeline Safety participates in more than 25 national voluntary consensus standards committees.² INGAA and its members participate in many of these committees, too, and INGAA recognizes that the value of the consensus process cannot be fully realized until the results of that process, revised and improved technical standards, are incorporated into PHMSA’s regulations.³ The Proposed Rule takes this necessary, final step, and INGAA appreciates PHMSA’s effort.

INGAA supports the proposed miscellaneous edits to Part 192 and takes no position on the remaining miscellaneous edits.

¹ 74 Fed. Reg. 36139.

² *Id.* at 36140.

³ The American Gas Association (“AGA”) describes this aspect of the Proposed Rule nicely:

AGA believes it is beneficial to incorporate voluntary consensus standards as part of federal pipeline safety regulations when the standards have been tested and incorporating these standards advances safety. AGA also believes it is beneficial to update standards that PHMSA incorporates by reference to allow pipeline operators to use current technology, materials and operating practices.

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INGAA appreciates the opportunity to comment in this docket and offers its continued assistance in the development and incorporation by reference of consensus technical standards.

Respectfully submitted,

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