

Mr. H. R. Remmel  
Senior Engineer  
City of Palo Alto  
Water-Gas Sewer Department  
Palo Alto, California 94301

Dear Mr. Remmel:

This is in reply to your letter of February 11, 1971, submitting your annual report as required by 49 CFR, Part 191 and requesting an interpretation of 49 CFR, Section 192.321(e). You state that you have a good mapping system and therefore have not used an electric conductive wire for locating underground plastic pipe. You further state that, as a municipal agency you control other street excavations.

49 CFR, Section 192.321(e) was intended to be prospective in effect and apply only to new construction, not to pipe in the ground on the effective date of the regulation.

We would interpret your mapping systems to be "other means" within the regulation, if it has a permanent geographic reference that is not solely the location of the street.

Thank you for your interest in pipeline safety.

Sincerely,

/signed/

Joseph c. Caldwell  
Director, Acting  
Office of Pipeline Safety