

November 1, 1990

Ms. Kim Lilly
One-Call Systems
International Committee
Suite 440
4747 N. Seventh Street
Phoenix, AZ 85014

Dear Ms. Lilly:

This responds to your letter of July 25, 1990, in which you asked if RSPA's anti-drug rules in 49 CFR Part 199 apply to employees of One-Call Centers.

One-Call services which notify membership of planned excavation are not subject to 49 CFR Part 199 unless the service is performed for the pipeline operator under contract; and pursuant to Part 192, is also receiving, identifying, or classifying notices of events or making emergency decisions which need immediate response by the operator or notice to fire, police, or other officials.

Sincerely,

George W. Tenley, Jr.
Associate Administrator for
Pipeline Safety