

DEPARTMENT OF TRANSPORTATION**Federal Highway Administration
Research and Special Programs
Administration**

49 CFR Parts 171, 173 and 387

[Docket Nos. HM-198; Notice 87-8 and MC-128; Notice 87-3]

**Enforcement of Motor Carrier
Financial Responsibility Requirements**

AGENCY: Office of Hazardous Materials Transportation, Research and Special Programs Administration (RSPA) Office of Motor Carrier Standards, Federal Highway Administration (FHWA).
ACTION: Advance Notice of Proposed Rulemaking (ANPRM).

SUMMARY: This notice solicits comments on the merits of a petition for rulemaking filed with RSPA and FHWA proposing to amend Title 49 of the Code of Federal Regulations to require each person offering a hazardous material for transportation, by highway, in cargo tanks to obtain documentary proof that the motor carrier possesses the minimum level of financial responsibility currently prescribed by regulation (49 CFR Part 387); that such persons maintain such proof for a certain period of time; and that such proof should be produced for review upon reasonable request by a member of the public. Comments are also sought on a corresponding amendment that would require such documentation be tendered by motor carriers to those shippers for whom they transport hazardous materials.

DATE: Comments must be submitted on or before August 18, 1987.

ADDRESSES: All comments should refer to the docket numbers and notice numbers that appear at the top of this document and should be submitted, preferably in quadruplicate, to the Office of Hazardous Materials Transportation (OHMT), RSPA, Dockets Branch, DHM-82, Room 8425, 400 Seventh Street, SW, Washington, DC 20590. The Office of Hazardous Materials Transportation is compiling the information received in response to this notice, and written comments should be submitted to this office. Persons wishing to receive confirmation of receipt of their comments should include a self-addressed, stamped post card. Public dockets may be reviewed between the hours of 8:30 a.m. and 5:00 p.m. Monday through Friday. Telephone (202) 366-5046.

FOR FURTHER INFORMATION CONTACT: Mr. Joseph S. Nalevanko, Policy

Development and Information Systems Division, (202) 366-4404. Research and Special Programs Administration, 400 Seventh Street, SW, Washington, DC 20590, or Mr. Neill L. Thomas, Office of Motor Carrier Standards, (202) 366-4989, or Mr. Thomas P. Holian, Office of the Chief Counsel, (202) 366-0834, Federal Highway Administration, 400 Seventh Street, SW, Washington, DC 20590.

SUPPLEMENTARY INFORMATION**Background**

On February 17, 1986, the National Tank Truck Carriers, Inc. (NTTC) filed a petition for rulemaking under the provisions of 49 CFR 106.31 and 390.31. The petition is published verbatim in this notice. This ANPRM is issued to obtain comments on the merits of the petition from interested parties as one aspect of the Department's decision on whether to proceed with rulemaking, by requesting comments from parties interested in participating in this action. RSPA and FHWA have formulated a series of questions that are designed to assist in determining the potential costs and safety benefits associated with the NTTC petition. These questions follow immediately after the verbatim transcript of the NTTC petition. Additionally, without prejudice to the merits of the NTTC petition, we call attention to the following paragraph which appears in the petition:

Another deficiency in this system is the unavailability of adequate enforcement staff to effectively determine carrier compliance. Under anticipated budgetary constraints, the level of enforcement staffing within DOT is unlikely to increase. A major benefit of the proposed amendments would be the creation of a ready mechanism for shippers to verify their carriers' compliance, without expenditure of any government resources.

The FHWA has no authority over shippers. Therefore, this ANPRM does not propose to expand the authority of the FHWA over shippers in the area of hazardous materials regulation. The RSPA has authority to promulgate regulations governing the shipment and transportation of hazardous materials if they apply to both shippers and carriers.

The petition for rulemaking follows before the Administrator, Federal Highway Administration and the Administrator, Research and Special Programs Administration, United States Department of Transportation, a *Petition for Rulemaking in the Matter of Proposed Amendments to Current Regulations Dealing with Mandatory Evidence of Financial Responsibility*

Filed by National Tank Truck Carriers, Inc., 2200 Mill Road,

Alexandria, Virginia 22314, (703) 838-1908, Clifford J. Harrison, Managing Director.

February 17, 1986.

This document is a petition by National Tank Truck Carriers, Inc. (NTTC) to amend the Federal Motor Carrier Safety Regulations (at 49 CFR Parts 387 and 390-397) and the Hazardous Materials Regulations (at 49 CFR Parts 170-176).

NTTC is the trade association of the for-hire tank truck industry and is composed of over 200 corporate members engaged in the transportation of hazardous and non-hazardous materials in interstate, intrastate and international commerce throughout the 48 Continental United States. As a motor carrier/members are subject to the Federal Motor Carrier Safety Regulations and the Hazardous Materials Regulations (which, with certain exceptions, have been adopted therein).

The objective of this petition is to amend Title 49 of the Code of Federal Regulations to require shippers of hazardous materials in cargo tanks to maintain documentary evidence of carrier compliance with regulatory requirements for so-called "mandatory evidence of financial responsibility", for those motor carriers they use to transport hazardous materials. Furthermore, we seek a corresponding amendment to the regulations to require that such documentation be tendered by motor carriers to those shippers for whom they transport hazardous materials.

Background

Beginning in 1980 (and pursuant to Congressional passage of the Motor Carrier Act (MC Act)) all motor carriers were required to obtain evidence of financial responsibility in varying amounts and forms, usually by insurance and/or bonding. Subsequent to passage of the MC Act, the Federal Highway Administrator promulgated regulations which require all carriers to have appropriate evidence of financial responsibility available for public inspection at their principal place of business (see 49 CFR 387.7). Contemporaneously, the Interstate Commerce Commission (ICC) issued controlling regulations applicable to for-hire carriers of property, prescribing the use of Form BMC-90 which would be maintained within the carrier's public docket (on file at the ICC).

In taking these actions, the Federal Highway Administrator and the ICC designed a two-pronged method whereby carriers could document for the

public and appropriate Federal and State enforcement personnel that they complied with Section 30 of the Motor Carrier Act.

The Problem

Given over 5 years of experience with this legislative and regulatory structure, it is evident that serious deficiencies in both compliance and enforcement still exist, and such deficiencies work to frustrate the objectives of Congress as stated on page 42 of the House of Representatives Report No. 98-1068, to-wit: "... to encourage the carriers to engage in the practices and procedures that will enhance the safety of these equipment so as to afford the best protection to the public."

The most serious deficiency in the present regulatory scheme is that the hazardous materials shipper—the entity which initiates the transportation—is not required to be included in the communications "loop" designed to assure compliance with section 30 of the MC Act. In other words, as the regulations are written today, a shipper would have to make a special effort to determine a carrier's compliance with the mandate of section 30 of the MC Act, by either physically checking the carrier's ICC file, or by requesting such information from individual carriers. The NTTC proposal (if adopted) would eliminate this shortcoming.

Another deficiency in this system is the unavailability of adequate enforcement staff to effectively determine carrier compliance. Under anticipated budgetary constraints, the level of enforcement staffing within DOT is unlikely to increase. A major benefit of the proposed amendments would be the creation of a ready mechanism for shippers to verify their carriers' compliance, without the expenditure of any government resources.

The Proposed Solution

This petition seeks to close this communications loop and to strengthen the compliance mechanism by amending the regulations to require carriers to give evidence of financial responsibility to hazardous materials shippers, prior to or at the time of loading. Furthermore, the proposed amendments would require hazardous materials shippers to keep copies of evidence of financial responsibility given to them by their carriers.

DOT Jurisdiction

Our proposal would amend both the Federal Motor Carrier Safety Regulations (promulgated under the jurisdiction of the Federal Highway

Administrator) and the Hazardous Materials Regulations issued by the Administrator, Research and Special Programs Administration. These, we have elected the procedure of filing this petition, jointly.

There can be no reasonable doubt that the Administrators have sufficient jurisdiction within which to act in accordance with this petition. Section 105 of the Hazardous Materials Transportation Act (HMTA) of 1974 specifies that the Secretary's regulations "... shall be applicable to any person who transports, or causes to be transported or shipped, a hazardous material." (emphasis supplied)

Additionally, the HMTA Act states that "Such regulations may govern the safety aspect of the transportation of hazardous materials which the Secretary deems necessary or appropriate."

Therefore, there can be no dispute as to the Secretary's (and, hence, the Administrators') authority to promulgate more viable regulations in this area. Also, it is important to note that nothing in NTTC's proposal would impact ICC regulations or jurisdiction, since the Commission exercises no jurisdiction over the shipping community.

Why These Amendments Are Sought

Regardless of the current dislocations in the insurance market, NTTC suggests that significant post-1980 changes in the hazardous materials transportation marketplace mandate refinement of the current "insurance regulations" in order to better protect the public and carry out the intent of Congress. A major evidence exists that noncompliance is widespread. Indeed, the Director of the Bureau of Motor Carrier Safety has stated publicly that 1983 and 1984 field audits of carriers' documents that approximately 25% of positive carriers did not have appropriate evidence of financial responsibility to comply with current regulations.

There are two more significant post-1980 changes in the motor carrier industry which prompt this petition are: (1) The expanded entry of new motor carriers into the field of the transportation of hazardous materials; (2) the increased use by shippers of so-called "customer pickup" of hazardous materials in their own vehicles; and (3) the increase in the number of commodities regulated as "hazardous materials/hazardous wastes" by the Department and EPA.

There can be little doubt that the number of individuals, corporations, partnership, etc., involved in interstate

trucking has increased substantially. While Dun & Bradstreet estimates that some 3,400 carriers have exited the business since 1980, the ICC points out that (through 1984) some 18,000 certificates of public convenience and necessity have been issued to new entrants. Generally, such new entrants are small businessmen to whom economic survival dictates extensive backhauling with just about any type of load they can find. It is, therefore, quite reasonable to assume (particularly in view of the BMC's Director's remarks noted above) that many carriers transporting hazardous materials (in a variety of packaging) are doing so in noncompliance with current financial responsibility regulations.

It is impossible to calculate with any degree of precision the true impact of post-1980 entry into motor carriage. For instance, ICC decisions dealing with intercorporate hauling, so-called "Toto" transportation, relaxed loading requirements, and ICC interpretations which have greatly expanded the scope of Certificates of Public Convenience and Necessity and Permits for Contract Carriage, tend to validate virtually any shipper/carrier arrangement as being in compliance with the MC Act.

While no regulatory action is going to correct every problem area, these proposed amendments would create a threshold requirement (passing of documentation from carrier to shipper) which would enhance public protection and safety, and ease enforcement burdens. This would establish a self-checking mechanism by both parties involved in the transportation.

Yet another significant change in the post-1980 period is the acceleration of so-called "customer pick-up". Typical of such a situation is the following:

The XYZ Company sells 6,000 gallons of a hazardous chemical to a customer. The customer specifies that it will use its own vehicle for transporting the product from the XYZ Company to final destination. Change of title for the product occurs at the loading of the customer's vehicle at the XYZ Company's loading point.

Since title was transferred "at the point of sale," (and it is unclear whether the XYZ Company is bound to perform the duties and accept the responsibilities of the role of a shipper (e.g., provide placards, product classification and description for the shipping papers, inspect the vehicle, etc.)) This confusion has led many hazardous materials producers to think they have no regulatory responsibilities for loads that were picked up by their customers. As motor carriers of

hazardous materials, the customer is subject to the financial responsibility requirements under the MC Act.

This scenario is no rare exception to common transportation practices. Major chemical companies have indicated to NTTC that up to 50 percent of their total tank truck shipments involve so-called "customer pick-up". The proposed amendments would assure that any person offering hazardous materials to any motor carrier would have proof of the carrier's compliance with the law, before or at the time of loading.

While transportation lawyers and regulators may differ in their interpretations of legal obligations by the parties (involved in customer pick-up), the issue of public safety may be somewhat compromised. The amendments proposed by NTTC would enhance public safety by requiring that minimum required evidence of financial responsibility for hazardous materials transportation be "in place" either prior to or at the time of loading.

Just as there can be no rational argument against the fact that motor carrier entry has expanded—so too must the same reality be applied to the considerable expansion of the list of commodities regulated (as hazardous materials, hazardous substances and hazardous wastes) by the Administrator and the Secretary.

Congressional passage of and subsequent amendments to the Resource Conservation and Recovery Act (RCRA), and the Comprehensive Environmental Restoration and Clean-up Liability Act of 1980 (CERCLA) (Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)) (sic), created new classifications of measurement of transportation hazards and has led to much uncertainty and confusion in the transportation marketplace. For example, all hazardous substances are deemed by DOT regulation to be hazardous materials, yet not all hazardous materials are hazardous substances. The phrase "listed, but not regulated, . . ." is in common use, but is not commonly understood, and certain hazardous wastes are specified, while others may or may not fall within the "hazardous waste" classification (depending upon concentration, waste stream constituents, and other characteristics known only to the product shipper).

In light of the many regulatory anomalies created, NTTC respectfully suggests that most of the new entrants into motor carriage (and many of the established carriers) do not know and would be hard pressed to determine whether or not carriage of certain

products would trigger the appropriate levels of "evidence of financial responsibility" necessary for compliance.

Historically, the Department has relied upon the shipper—the entity in the transportation chain most familiar with the hazard characteristics of the product—to properly classify and package the commodity placed in commerce as the first step to regulatory compliance. Yet, as the BMDCS Director's comments noted above, prove a significant loophole in the regulatory scheme exists.

Adoption of the NTTC proposal would help close this loophole by requiring a very basic change of existing information preceding or at the time of the shipment of a hazardous material, hazardous substances or hazardous waste. All the shipper need do is "cross-check" the hazard class of the shipment against the evidence of financial responsibility offered by the carrier to assure regulatory compliance.

Again, the regulatory goal of public protection would be served by assuring that properly insured carriers are handling sensitive products.

Specific Relief Sought

NTTC hereby petitions that the following sections of Title 49 CFR be amended to read:

At 49 CFR 387.7(e)—add the italicized language:

(e) The proof of minimum level of financial responsibility required by this section shall be considered public information, and in the case of transportation in cargo tanks shall be provided to every person using the services of the motor carrier. Such proof also shall be produced for review upon reasonable request by a member of the public.

At 49 CFR 173.20—add the italicized language:

(b) No person may transport a hazardous material in compliance unless that material is loaded and transported in accordance with the subchapter in an exemption listed under subchapter B of this Chapter. Transportation in cargo tanks by highway must be conducted in accordance with minimum levels of financial responsibility required under 49 CFR Part 387.

At 49 CFR 173.22—add new italicized paragraph (e):

(e) A person offering a hazardous materials for transportation by highway in cargo tanks shall obtain proof that the motor carrier possesses the required minimum level of financial responsibility prescribed under 49 CFR Part 387. (sic).

At 49 CFR 177.804—amend the phrase ". . . shall comply with 49 CFR Parts 390 through 397" to read, "shall comply with 49 CFR Parts 387 and 390 through 397. . ." (amendment italicized).

This petition (if granted) would impose minimal obligations on parties who "offer" hazardous materials for transportation by highway, and motor carriers engaged in such transportation. We have drafted our proposed amendments to reflect DOT jurisdiction over both shipper and carrier.

Adoption of the Proposal Would not be Burdensome to any Party Including the Government.

NTTC is cognizant of the need to craft a regulatory structure that is effective, yet does not unduly burden the resources of either government or the regulated community.

Currently, the Department requires that carriers simply maintain "proof of financial responsibility" for public inspection. The NTTC proposal does not call for the creation of any new forms or documents.

In some cases, the "proof" may be in the form of a photocopied insurance (or bonding) binder, while in others it may be a photocopy of an ICG carrier's Form BMC-99 (already required by regulation). Where the shipper and carrier have an existing business arrangement, documentation could be filed by mail and maintained on file. Where the transportation arrangement is of a more immediate or temporary nature, such documentation could easily be carried on the vehicle and transferred at the point of loading. In short, the means of providing evidence of financial responsibility will be a matter between carrier and shipper.

This proposal does not intrude into normal business relationships or deviate from standard business practices. By mandating what is in effect, the carrier's verification of his regulatory compliance, the NTTC proposal simply borrows a concept from other governmental programs. For instance, the Equal Employment Opportunity Commission requires persons engaged in business relationships to certify compliance with statutory requirements for non-discriminatory hiring and promotion practices, use of minority-owned firms for contracts, etc. The Internal Revenue Service is heavily reliant on self-certification of wages, fees, etc. paid to contractors and other independent businesspersons. The Environmental Protection Agency requires gasoline terminal loading points to maintain copies of a tank vehicle's most recent certification of leak tightness test conducted under the so-

called "Method 27" test—filed by the motor carrier.

At least two major shippers of hazardous materials—Texaco and the Mobil Oil Corporation—already require carriers to provide them with exactly the same information as would be required by the NTTC proposal.

The NTTC proposal would not create a paperwork burden. Shippers and carriers have long demonstrated that they have no aversion to generating paperwork for their own protection. Such may range from complex contracts—wherein obligations, terms and conditions and responsibilities are expressly outlined—to simple and standard lease forms, bills of lading, etc. Transferring a single piece of paper represents little more than minor inconvenience that is more than outweighed by the public benefit to be gained.

Given the fact that NTTC is simply proposing a mandated exchange of copies of existing information to be accomplished prior to or during the time of loading of hazardous materials, we stress the fact that this aspect of the regulatory program can be implemented and enforced at no cost to the government. These amendments would be entirely consistent with the Paperwork Reduction Act, because of the minimal photocopying obligation imposed on motor carriers, and the total lack of any paperwork burden on the shippers or government.

In conclusion, we respectfully submit this petition before the Administrator, Federal Highway Administration and the Administrator, Research and Special Programs Administration. We seek expeditious publication of this proposal as a "Notice of Proposed Rulemaking" and prompt handling under the Administrator's Rules of Procedure and the Administrative Procedures (etc) Act.

Respectfully submitted,

Clifford J. Harrison,

Managing Director

To assist in the evaluation of the merits of the NTTC petition, RSPA and FHWA invite interested parties to comment on the petition, in particular, on the following questions.

Questions

1. The NTTC petition states that a "major benefit of the proposed amendments would be the creation of a ready mechanism for shippers to verify their carriers' compliance, without expenditure of any government resources." How would DOT enforce this proposal, if adopted, against shippers? Would there be any need for the government to inspect shippers for

compliance with such a proposal, if adopted? What impact will this have for shippers?

2. The NTTC petition states that "In light of the many regulatory anomalies created, NTTC respectfully suggests that most of the new entrants into motor carriage (and many of the established carriers) do not know and would be hard pressed to determine whether or not carriage of certain products would trigger the appropriate levels of 'evidence of financial responsibility' necessary for compliance." If this suggestion is true for motor carriers, is there any reason to believe that it would not also be true for shippers of hazardous materials, especially for small shippers? Are there any grounds for believing that shippers, especially small shippers, ought to be or are more knowledgeable concerning the financial responsibility obligations of motor carriers than the motor carriers themselves?

3. A substantial number of instances involving motor carrier non-compliance with the minimum financial responsibility requirements involves operation without appropriate levels of financial responsibility, that is, those motor carriers had proof of financial responsibility (a Form MCS-99 endorsement) but in fact the level of financial responsibility carried was inappropriate or inadequate in terms of the motor carrier's activity or activities. Since an appropriate level of financial responsibility is a function of the hazardous material carried, the containment system, and whether the motor carrier operates in intrastate, interstate, or foreign commerce, what additional fact-finding mechanism will shippers have to employ in order to determine that the copy of the Form MCS-99 endorsement furnished to the shipper by the motor carrier does represent an appropriate level of financial responsibility for the motor carrier's activity, if the current instances of motor carriers having inappropriate or inadequate levels of financial responsibility are to be avoided?

4. Information submitted by the NTTC shows that a large percentage of the number of audits of motor carriers of hazardous materials in cargo tanks involves failure to maintain proof of financial responsibility at the motor carrier's principal business office. Yet, 49 CFR 387.2(d) states, in clear and unambiguous fashion, that "Proof of the required financial responsibility shall be maintained at the motor carrier's principal place of business." Would requiring shippers, as proposed by the NTTC, to obtain and maintain a copy of the motor carrier's proof of financial

responsibility reduce the number of instances of motor carriers failing to maintain proof of their financial responsibility at the motor carrier's principal place of business? What are the resource implications for federal and state inspection efforts if 49 CFR 387.2(d) is still to be enforced on motor carriers and, if the NTTC proposal were adopted, on shippers as well?

5. Where would the shipper be required to maintain a motor carrier's proof of financial responsibility, at the principal place of business or at each shipping origin? What files should the proof be maintained in? How long would the shippers be required to keep the proof of financial responsibility for each motor carrier used? How often would shipper be required to obtain proof of financial responsibility? If the shipper and consignee are different, where should the evidence of financial responsibility be on file? How would a shipper be aware or notified if a motor carrier's financial responsibility coverage were canceled?

6. In light of the fact that motor carriers who are unable to obtain insurance in the voluntary insurance market may have to obtain coverage in the residual risk market, and that there may be less incentive for motor carriers insured through assigned risk premiums to maintain good safety records (since premium rates in the assigned risk market are not affected by a motor carrier's safety record), what safety benefit is achieved by the NTTC proposal that shippers be given proof of a motor carrier's financial responsibility?

7. The NTTC proposal would, as a practical matter, only affect for-hire "bulk" motor carriers of hazardous materials, and customers picking up hazardous materials in bulk in their own vehicles. A large percentage of "bulk" hazardous materials shipments are made by private motor carriers. (In one study, it was found that 78 percent of the liquid tank truck fleet was operated by private motor carriers.) From the standpoint of regulatory equity and nondiscriminatory competitive impact, is there a mechanism comparable to that proposed by the NTTC that could be applied to private bulk motor carriers? Should the requirement be applied to all motor carriers, transporters of explosives, poison A materials, and radioactive materials? What effect would this proposal have on the transportation by farmers that transport anhydrous ammonia or other products in nurse tanks, or other fertilizer application equipment? How would this

proposal be implemented in "Turn-Key" operations?

8. Because shippers of hazardous materials must decide from what plant or warehouse a shipment should be made to a customer's plant or warehouse, and must match shipment orders with appropriate motor carriers, what administrative and management information transaction costs would adoption of the NITTO proposal impose on shippers, especially where the transportation arrangement is of a more immediate or temporary nature?

9. Please summarize your understanding of the costs which adoption of the NITTO proposal would impose on your firm or industry in terms of the following categories and, if possible, provide substantiating data.

- Costs in checking the documentation of the financial responsibility provided by motor carriers.

- Costs in paper work in providing and maintaining such documentation.

- Costs, including litigation costs, associated with liability claims and counter-claims that might arise due to the adoption of the proposal.

- Costs to shippers and motor carriers due to delays in furnishing or properly checking the documentation or evidence provided by motor carriers to shippers.

- Costs in responding to requests from members of the public to review such documentation.

- Costs associated with enforcement penalties due to inadvertent being in non-compliance with the requirements of the NITTO proposal, if adopted.

- Costs of rule familiarization (managerial and technical).

10. How would the foregoing costs vary if the proposed requirement were applied only to "bulk" motor carriers? If applied to all motor carriers?

11. The American Bus Association has petitioned the FHWA to require a copy of the proof of financial responsibility be carried on each motor vehicle at all times. Would adoption of a requirement for motor carriers to maintain a copy of the proof of financial responsibility on all motor vehicles at all times satisfy the concerns expressed by NITTO in their petition for rulemaking? Are there other alternatives for insuring the compliance record of motor carriers with the requirements for minimum levels of financial responsibility?

Commenters are not limited to responding to the questions raised above and may submit any facts and views consistent with the intent of this notice. In addition, commenters are encouraged to provide comments on "major rule" considerations under terms of Executive Order 12291, "Significant rule" considerations under DOT

regulatory procedures (44 FR 11034), information collection burdens which must be reviewed under the Paperwork Reduction Act, and economic impact on small entities subject to the Regulatory Flexibility Act. A draft regulatory evaluation will be prepared as this rulemaking action progresses, based upon the comments received in response to this notice.

List of Subjects

49 CFR Parts 171 and 173

General requirements, Shipper's responsibility, Motor carrier safety.

49 CFR Part 387

Highways and roads, Insurance, Motor carriers, Surety bonds.

Catalogue of Federal Domestic Assistance Program Number 20.217

Authority: 49 U.S.C. 1002 note, 49 CFR 1.101 and 391.25, 49 U.S.C. 1004, 1004, 1005, 1006, 1007, 49 CFR 1.53(e), 1.53, App. A to Part 1, 49 U.S.C. 1005, 1005(e).

Issued in Washington, DC on May 14, 1987.

R.A. Barnhart,
Administrator, Federal
Highway Administration.

Alex J. Roberts,
Director, Office of Hazardous Materials
Transportation, Research and Special
Programs Administration.

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