

March 9, 1990

Mr. Russell W. Copeland
Chief, Utilities Safety Branch
State of California
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Mr. Copeland:

You have asked us to settle the issue of whether a company's meter readers and customer service representatives are subject to drug testing under 49 CFR Part 199.

Persons subject to drug testing are those who perform on a pipeline or LNG facility an operating, maintenance, or emergency-response function regulated by 49 CFR Part 192, 193, or 195. If a company uses a person who is a meter reader or customer service representative to perform one of these functions, that person is subject to drug testing. Because different companies may assign different responsibilities to their meter readers and customer service representatives, these persons could be subject to testing at one company but not at another.

We are revising our guidelines to explain this issue and other aspects of Part 199 that have been of concern to operators and State agencies. I will be pleased to send to you a copy of the guidelines when they are completed.

Sincerely,

George W. Tenley, Jr.
Director
Office of Pipeline Safety