

**1. Can you confirm that under existing requirements, no one would ever be required to submit to PHMSA pipeline and PHMSA hazmat separate reports for a single pipeline event?**

Yes. PHMSA pipeline and PHMSA hazmat each target different types of incidents and are filed by different entities. If an incident occurs on a non-pipeline mode, the 5800.1 form is to be completed by the entity in physical possession of the hazardous material during transportation. For an incident involving a pipeline, the 7000-1 is to be completed by the pipeline operator. Additionally, there is no modal overlap between the two submissions.

**2. Regarding the 151 instances during the 10 year period in which railroads submitted separate event reports to both PHMSA and FRA, what additional utility was gained by the separate reports? Why shouldn't the requirements be changed to never require reports to two DOT modes?**

PHMSA and FRA each collect and maintain safety data in a manner specifically tailored to allow each agency to fulfill its mission and to support safety measures unique to each agency (regulations, enforcement, reports, etc.). PHMSA and FRA's individual forms and electronic reporting systems are structured to allow the agencies to manipulate and sort the data in manner that is relevant to the agency's needs. Without that autonomy, agencies may be compromising the utility of the data and running the risk of undermining the integrity of the information simply to create one reporting system. Specifically, the benefit of maintaining separate forms is to allow each agency to collect and, more importantly, use the data in a manner that meets its statutory mandates, stakeholders needs, and address specific safety issues involved in each industry.

As outlined in the report, these benefits outweigh the minimal benefit of merging the forms (eliminating 151 reports).

**3. We reviewed Appendix A but don't really see concrete steps to address the data problems encountered during review of the HHFT rule. How will PHMSA improve data quality? For example, improve the accuracy of the societal cost of events.**

As previously mentioned in Appendix A, PHMSA is in the process of implementing IT enhancements both on the internal and external user facing portals. Externally, this new incident management system will guide incident reporting entities through an intuitive process that will ensure data quality by building business rules into the submission process. Further this system will provide field by field tool tips and guidance to external user to ensure they are filling out all fields (including those that discuss costs) in the most accurate way possible. The system will automatically send out email requests for updates to incident forms 11 months after submission (in line with 49 CFR 171.16(c)). These updates may result in more accurate societal cost estimates given that at the 30 day mark of initial submission accurate costs may be unknown or incomplete. Internally, the new system will improve efficiency and better track workflow.

OHMS is in the process of developing a Data Operations Quality Management System (QMS) and seeking International Organization for Standardization (ISO) 9001:2015 Certification. To facilitate continuous improvement in support of PHMSA's mission, the OHMS Program Development Division is establishing an ISO 9001:2015 compliant QMS. The ISO 9001:2015 standard is based on a number of quality management principles, including a strong customer focus, the motivation and implication of top management, the process approach, and continual improvement through audits for nonconformities. These non-conformities could include data quality issues (such as accuracy of specific data fields) that may be documented in the course of an audit.

**4. Are there any concerns with uploading the report into ROCIS so that it is publically available? If so, what are they?**

Given the compelling results of PHMSA and FRA's analysis, we did not see the need to make this report available publically. That said if it will facilitate renewal of the ICR we have no objection.