

AF51-2
PDR

From: Charles Emeigh
To: WND1.WNP9(EOH)
Date: 6/12/96 8:34am
Subject: Chuck, thank you for getting back to me on the Section 110.27 matter. I passed -Reply

Elaine,

I guess one could consider the requirements for a written certification to mean that advance notification is necessary. However, if a shipper knew that he was going to make multiple shipments to a certain licensee, he would likely request and receive a blanket certification that the required protection measures would be applied. Also, it is not unreasonable to imagine that a perspective shipper might request a certification from a perspective receiver far in advance of a shipment. "Advance notification" to us is used more in the context of a notification that the departure of the shipment is imminent. It is really splitting hairs when one attempts to classify these activities in terms of "notification" versus "advance notification."