

8-5-93

Mr. Albert T. Richardson
Tenneco Gas
1010 Milam Street
Houston, TX 77252-2511

Dear Mr. Richardson:

This responds to your letter of February 25, 1991, to William Gute. The letter discusses Tenneco's use of computers instead of paper to record and store information it must maintain under 49 CFR Parts 191 and 192. You asked us to determine standards that would be acceptable in maintaining this information in computers.

Under Parts 191 and 192, operators may use any recordkeeping procedure that produces authentic records, without the prior approval of this agency. The proposed standards enclosed with your letter, which are aimed at ensuring the authenticity of computerized records, are permissible under Parts 191 and 192.

Although authenticity of records concerns us, for both computer and paper records, we do not believe there is sufficient need to adopt generally applicable standards governing recordkeeping procedures. In the absence of such standards, we ordinarily do not review an operator's recordkeeping procedures unless the legitimacy of records is in question. Accordingly, we have no comments at this time on the adequacy of your proposed standards.

Sincerely,

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