



EX Numbers Update ICAP – March 29, 2016

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DoD Approved EX Numbers

- DoD-DoT PHMSA met on February 11th – Result: DoD needs to build a better business case.
- The National Armaments Consortium (NAC) sent out a member survey to gather data at the beginning of March.
- MIBTF will work with the NAC to develop a long-term solution – either a Proposed Rule or Legislation.
- Next DoD-DoT PHMSA meeting is mid-April.

Use of Analogy

- Need more relevant data on impacts to industry – NAC survey should provide this.
- Analogy across labs should be allowed – currently this is a departmental policy and must be changed by PHMSA.
- Lack of historical data makes it more difficult to argue for widespread use of analogy.
- Submitted a request to Harpreet Singh to brief MIBTF.