



June 25, 2019

Chairman Frank Pallone  
Committee on Energy & Commerce  
2125 RHOB  
Washington, D.C. 20515

Ranking Member Greg Walden  
Committee on Energy & Commerce  
2322 RHOB  
Washington, DC 20515

Chairman Bobby L. Rush  
Energy Subcommittee  
2125 RHOB  
Washington, D.C. 20515

Ranking Member Fred Upton  
Energy Subcommittee  
2322 RHOB  
Washington, DC 20515

Dear Chairmen Pallone & Rush and Ranking Members Walden & Upton,

The Fiber Optic Sensing Association writes to support the Pipeline and Hazardous Materials Safety Administration's proposal on safety pilot programs as part of the agency's 2019 reauthorization. We believe this initiative can play a critical role in the adoption of advanced leak detection technologies and other pipeline safety innovations in the United States.

The Fiber Optic Sensing Association is a non-profit organization whose mission is to educate industry, government and the public on the benefits of fiber optic sensing. Many of our members operate in the pipeline sector, providing technology for the detection of leaks, intrusion, seismic activity and other dangerous conditions in dozens of countries around the globe. Outside the United States, thousands of miles of pipeline are protected with fiber optic sensing, and now many U.S. operators are considering this technology as a way to make their pipelines safer.

For several years, the deployment of effective leak detection technology has been an important bipartisan policy objective of Congress. Among the as yet unfulfilled mandates of the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 is the mandate for PHMSA to require hazardous liquid pipeline operators to use leak detection systems where practicable, and for the agency to establish technically, operationally, and economically feasible standards for the capability of such systems to detect leaks.

We believe that by providing data necessary for standards development, the proposed safety pilot programs will help operators validate new technology performance *and* enhance PHMSA's capacity to meet its leak detection mandates. Moreover, we believe

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such pilot programs can occur while achieving a level of safety equivalent to that achieved under existing regulatory requirements.

Ultimately, Congress should, in our view, authorize the construction of a dedicated facility for pipeline safety testing, similar to government-supported facilities available to other transportation industries. But PHMSA's safety pilot program proposal is a good first step in that direction, and we urge you to support it.

Thank you for the opportunity to share our views with you. We look forward to working with you to make the U.S. pipeline system as safe as possible.

Sincerely,

*Mark Uncapher*

Mark Uncapher  
Executive Director, Fiber Optic Sensing Association