



November 2, 2011

Mike Israni
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
PHP-1
Washington, DC 20590-0001

VIA ELECTRONIC FILING (www.regulations.gov)

Re: *Safety of Gas Transmission Pipelines*, Docket No. PHMSA-2011-0023

Dear Mr. Israni:

In response to the advance notice of proposed rulemaking (ANPRM) issued in this docket on August 18, 2011, and published in the August 25, 2011, issue of the *Federal Register* (76 Fed. Reg. 53086), the Interstate Natural Gas Association of America (INGAA) has chosen file its comments in two separate submissions. The attached filing addresses ANPRM topics at a policy level. INGAA wanted to submit these policy-level comments early to share its membership's views with other stakeholders. INGAA will make a second filing closer to the comment deadline to respond to the ANPRM's questions in detail.

We hope these comments will facilitate consensus among different stakeholders on common goals and ways to achieve these goals. We welcome early feedback from PHMSA and others on the points offered in this filing.

Please contact me if you have any questions.

Respectfully submitted,

/s/

Terry D. Boss
Senior Vice President of
Environment, Safety and Operations
Dan Regan
Regulatory Attorney
Interstate Natural Gas Association of America
20 F Street, N.W., Suite 450
Washington, DC 20001
(202) 216-5900

attach:

cc: Jeffrey D. Wiese, PHMSA (w/attach.)
Linda Daugherty, PHMSA (w/attach.)