MEMORANDUM FOR DISTRIBUTION

FROM: SCOTT WHITEFORD
SENIOR REAL PROPERTY OFFICER
DIRECTOR, OFFICE OF ASSET MANAGEMENT

SUBJECT: Classification of Trailers

The purpose of this memorandum is to reaffirm the criteria for identifying trailers as real property or as personal property. This criteria applies to all trailers the Department has a legal interest in or right to use. ¹

Trailers are purchased as personal property but the majority are then reclassified as real property. The attribute that distinguishes real property trailers from personal property trailers is permanence. A trailer permanently affixed to the ground is properly classified as real property and should be entered into the Facilities Information Management System (FIMS). The trailer size (i.e. single-wide trailers), use (i.e. storage, office, etc.), or expected period of use are not criteria for determining permanence. Indicators of permanence include one or more of the following:

- Permanent utility connection(s)
- Attachment to the ground in such a way that does not facilitate quick or easy relocation

Assembled modular units (triple wide or larger) should be recorded in FIMS with a Property Type of Building.

Trailers which do not meet the above criteria are properly classified as personal property and therefore not entered into FIMS. Instead, they should be recorded in the Program’s personal property system.

Due to the inherent portability of trailers, their classification as real or personal property may change multiple times during their lifecycle. Whenever there is a change in permanence, reevaluation of real or personal property classification is required.

Request Programs review their trailer records to ensure all assets are properly classified and recorded.

The Office of Asset Management’s point of contact for this issue is Mr. Adam Pugh. He may be reached at 202-287-1397 or email adam.pugh@hq.doe.gov.

Distribution:
Randy Dins, Energy Efficiency and Renewable Energy
Andrew Szilagyi, Environmental Management
Peter Klemkowsky, Fossil Energy, National Energy Technology Laboratory
Thomas McGarry, Fossil Energy, Strategic Petroleum Reserve
Karen Boardman, National Training Center, Director
Bud Sokolovich, Legacy Management
David Brown, Office of Administration, Acting Director
Na'ilah Bowden, National Nuclear Security Administration, Director
Brice White, Naval Reactors Laboratory Field Office
Blake Burket, Naval Reactors Naval Yard
Mary McCune, Nuclear Energy, Director
Marcus E. Jones, Office of Science, Director
Stephan Capps, Bonneville Power Administration
Joel Seymour, Real Property, Director, Southeastern Power Administration
Heidi Miller, Western Area Power Administration
Terry Lamb, Federal Energy Regulatory Commission
Doug Hart, South West Power Administration
John Bashista, Office of Acquisition Management (MA-60)

CC:
Scott Whiteford, MA-50
Adam Pugh, MA-50