



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

SEP 11 2008

Mr. Craig Updyke
National Electrical Manufacturers Association
1300 North 17th Street, Suite 1752
Rosslyn, VA 22209

Ref. No.: 08-0172

Dear Mr. Updyke:

This is in response to your June 30, 2008 letter concerning the packaging of lithium batteries offered for transportation by aircraft under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) and International Civil Aviation Organization Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Technical Instructions).

A provision contained in Packing Instruction 968 of the ICAO Technical Instructions 2009-2010 edition requires certain packages containing lithium cells or batteries to be capable of withstanding a 1.2 meter drop test *without shifting of contents that would allow battery to battery (cell to cell) contact*. You ask if this provision is intended to prohibit all contact between batteries while in transport or just contact that could lead to short circuiting.

The intent of this provision is to ensure a package containing lithium cells or batteries is capable of withstanding in any orientation, a drop from a height of 1.2 meters while retaining the cells or batteries in their original orientation. In your letter, you provide an example of AA batteries packed in a blister pack where the insulating jackets of the batteries contact each other but no contact between the conductive terminals occurs. Cells or batteries securely packed in this manner would meet the intent of the requirement.

I hope this answers your inquiry.

Sincerely,

Susan Gorsky
Acting Chief, Standards Development
Office of Hazardous Materials Standards