



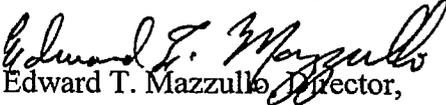
U.S. Department  
of Transportation  
Research and  
Special Programs  
Administration

# Memorandum

Date: JUN 13 2001

Reply to Attn. of: Ref. No. 01-0093

Subject: INFORMATION: Exceptions for small arms ammunition

From:   
Edward T. Mazzullo, Director,  
Office of Hazardous Materials Standards

To: William Wilkening, Manager,  
Cargo Security and Dangerous Goods Program

This is in response to your memo requesting clarification of the regulatory requirements for exceptions for small arms ammunition under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You ask if firearm magazines or "clips" satisfy the packaging requirement for small arms ammunition provided by § 175.10(a)(5).

Section 175.10(a)(5) requires that small-arms ammunition for personal use carried by a crewmember or passenger in his baggage (excluding carry-on baggage) be securely packed in fiber, wood or metal boxes, or other packagings specifically designed to carry small amounts of ammunition. This exception does not specifically include firearm magazines. Generally, firearm magazines or "clips" are not fully enclosed and do not satisfy the packaging requirements of § 175.10(a)(5). However, if a metal magazine or "clip" provides a complete and secure enclosure of the ammunition, e.g., a metal, plastic, or cardboard "oversleeve" designed to fit the clip, it would satisfy the requirements of § 175.10(a)(5).

I trust this satisfies your inquiry. If this Office can be of further assistance, please contact us.

#



U.S. Department  
of Transportation  
Federal Aviation  
Administration

Nelson  
§ 175.10 (a)(5)  
Exceptions for Small-arms  
**Memorandum**  
ammunition  
01-0093

Subject: **ACTION:** Request for Written  
Interpretation

Date: April 16, 2001

From: Manager, Dangerous Goods and Cargo  
Security Division, ACO-800

Reply to  
Attn. of:

To: Manager, Office of Hazardous  
Materials Standards, DHM-10

One of our regional offices recently received a verbal answer from the RSPA Hotline concerning 49 CFR 175.10(a)(5) and forwarded the attached correspondence to this office seeking a written interpretation from RSPA.

Can you please provide a written interpretation as to whether small-arms ammunition subject to the limitations listed in part 175.10(a)(5) inside clips or magazines specifically designed for their use are authorized? Please keep in mind that many (if not all) clips or magazines provide a configuration where one of the rounds of small-arms ammunition is partially exposed.

William Wilkening



U.S. Department  
of Transportation

Federal Aviation  
Administration

# Memorandum

Subject: **ACTION:** Small Arms Ammunition in Clips or  
Magazines

Date: APR 11 2001

From: Manager, Civil Aviation Security Division, ANM-700

Reply to  
Attn. of: T. Kenny ANM-708

To: Manager, Dangerous Goods and Cargo Security Division,  
ACO-800

The hazardous materials regulations, specifically at 49CFR 175.10 (a)(5), provide an exception for passengers to carry small arms ammunition for personal use in checked baggage if it is securely packed in fiber, wood or metal boxes, or other packagings specifically designed to carry small amounts of ammunition. It is not clear if ammunition clips or magazines meet the definition of metal boxes, or other packagings specifically designed to carry small amounts of ammunition.

This office recently contacted the Research and Special Programs Administration (RSPA) HOTLINE and asked if clips or magazines can be considered packagings for carrying small arms ammunition.

The verbal answer received from RSPA is that clips or magazines DO meet the requirements to be considered acceptable packagings for small arms ammunition.

I am writing to request that your office secure a written interpretation from RSPA on this matter on behalf of all regions.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. Blunk".

Robert M. Blunk



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

# Memorandum

Subject: **ACTION**: Request for Written  
Interpretation

Date: April 16, 2001

From: Manager, Dangerous Goods and Cargo  
Security Division, ACO-800

Reply to  
Attn. of:

To: Manager, Office of Hazardous  
Materials Standards, DHM-10

One of our regional offices recently received a verbal answer from the RSPA Hotline concerning 49 CFR 175.10(a)(5) and forwarded the attached correspondence to this office seeking a written interpretation from RSPA.

Can you please provide a written interpretation as to whether small-arms ammunition subject to the limitations listed in part 175.10(a)(5) inside clips or magazines specifically designed for their use are authorized? Please keep in mind that many (if not all) clips or magazines provide a configuration where one of the rounds of small-arms ammunition is partially exposed.

William Wilkening



U.S. Department  
of Transportation

Federal Aviation  
Administration

# Memorandum

Subject: **ACTION:** Small Arms Ammunition in Clips or  
Magazines

Date: APR 11 2007

From: Manager, Civil Aviation Security Division, ANM-700

Reply to  
Attn. of: T. Kenny ANM-708

To: Manager, Dangerous Goods and Cargo Security Division,  
ACO-800

The hazardous materials regulations, specifically at 49CFR 175.10 (a)(5), provide an exception for passengers to carry small arms ammunition for personal use in checked baggage if it is securely packed in fiber, wood or metal boxes, or other packagings specifically designed to carry small amounts of ammunition. It is not clear if ammunition clips or magazines meet the definition of metal boxes, or other packagings specifically designed to carry small amounts of ammunition.

This office recently contacted the Research and Special Programs Administration (RSPA) HOTLINE and asked if clips or magazines can be considered packagings for carrying small arms ammunition.

The verbal answer received from RSPA is that clips or magazines **DO** meet the requirements to be considered acceptable packagings for small arms ammunition.

I am writing to request that your office secure a written interpretation from RSPA on this matter on behalf of all regions.

Sincerely,

Robert M. Blunk

04 11 11

63012  
425 227 1700





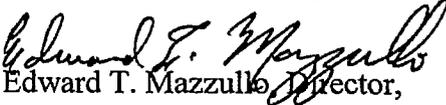
U.S. Department  
of Transportation  
Research and  
Special Programs  
Administration

# Memorandum

Date: JUN 13 2001

Reply to Attn. of: Ref. No. 01-0093

Subject: INFORMATION: Exceptions for small arms ammunition

From:   
Edward T. Mazzullo, Director,  
Office of Hazardous Materials Standards

To: William Wilkening, Manager,  
Cargo Security and Dangerous Goods Program

This is in response to your memo requesting clarification of the regulatory requirements for exceptions for small arms ammunition under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You ask if firearm magazines or "clips" satisfy the packaging requirement for small arms ammunition provided by § 175.10(a)(5).

Section 175.10(a)(5) requires that small-arms ammunition for personal use carried by a crewmember or passenger in his baggage (excluding carry-on baggage) be securely packed in fiber, wood or metal boxes, or other packagings specifically designed to carry small amounts of ammunition. This exception does not specifically include firearm magazines. Generally, firearm magazines or "clips" are not fully enclosed and do not satisfy the packaging requirements of § 175.10(a)(5). However, if a metal magazine or "clip" provides a complete and secure enclosure of the ammunition, e.g., a metal, plastic, or cardboard "oversleeve" designed to fit the clip, it would satisfy the requirements of § 175.10(a)(5).

I trust this satisfies your inquiry. If this Office can be of further assistance, please contact us.

#



U.S. Department  
of Transportation  
Federal Aviation  
Administration

Nelson  
§ 175.10 (a)(5)  
Exceptions for Small-arms  
**Memorandum**  
ammunition  
01-0093

Subject: **ACTION:** Request for Written  
Interpretation

Date: April 16, 2001

From: Manager, Dangerous Goods and Cargo  
Security Division, ACO-800

Reply to  
Attn. of:

To: Manager, Office of Hazardous  
Materials Standards, DHM-10

One of our regional offices recently received a verbal answer from the RSPA Hotline concerning 49 CFR 175.10(a)(5) and forwarded the attached correspondence to this office seeking a written interpretation from RSPA.

Can you please provide a written interpretation as to whether small-arms ammunition subject to the limitations listed in part 175.10(a)(5) inside clips or magazines specifically designed for their use are authorized? Please keep in mind that many (if not all) clips or magazines provide a configuration where one of the rounds of small-arms ammunition is partially exposed.

William Wilkening



U.S. Department  
of Transportation

Federal Aviation  
Administration

# Memorandum

Subject: **ACTION:** Small Arms Ammunition in Clips or  
Magazines

Date: APR 11 2001

From: Manager, Civil Aviation Security Division, ANM-700

Reply to  
Attn. of: T. Kenny ANM-708

To: Manager, Dangerous Goods and Cargo Security Division,  
ACO-800

The hazardous materials regulations, specifically at 49CFR 175.10 (a)(5), provide an exception for passengers to carry small arms ammunition for personal use in checked baggage if it is securely packed in fiber, wood or metal boxes, or other packagings specifically designed to carry small amounts of ammunition. It is not clear if ammunition clips or magazines meet the definition of metal boxes, or other packagings specifically designed to carry small amounts of ammunition.

This office recently contacted the Research and Special Programs Administration (RSPA) HOTLINE and asked if clips or magazines can be considered packagings for carrying small arms ammunition.

The verbal answer received from RSPA is that clips or magazines DO meet the requirements to be considered acceptable packagings for small arms ammunition.

I am writing to request that your office secure a written interpretation from RSPA on this matter on behalf of all regions.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. Blunk".

Robert M. Blunk



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

# Memorandum

Subject: **ACTION**: Request for Written  
Interpretation

Date: April 16, 2001

From: Manager, Dangerous Goods and Cargo  
Security Division, ACO-800

Reply to  
Attn. of:

To: Manager, Office of Hazardous  
Materials Standards, DHM-10

One of our regional offices recently received a verbal answer from the RSPA Hotline concerning 49 CFR 175.10(a)(5) and forwarded the attached correspondence to this office seeking a written interpretation from RSPA.

Can you please provide a written interpretation as to whether small-arms ammunition subject to the limitations listed in part 175.10(a)(5) inside clips or magazines specifically designed for their use are authorized? Please keep in mind that many (if not all) clips or magazines provide a configuration where one of the rounds of small-arms ammunition is partially exposed.

William Wilkening



U.S. Department  
of Transportation

Federal Aviation  
Administration

# Memorandum

Subject: **ACTION:** Small Arms Ammunition in Clips or  
Magazines

Date: APR 11 2007

From: Manager, Civil Aviation Security Division, ANM-700

Reply to  
Attn. of: T. Kenny ANM-708

To: Manager, Dangerous Goods and Cargo Security Division,  
ACO-800

The hazardous materials regulations, specifically at 49CFR 175.10 (a)(5), provide an exception for passengers to carry small arms ammunition for personal use in checked baggage if it is securely packed in fiber, wood or metal boxes, or other packagings specifically designed to carry small amounts of ammunition. It is not clear if ammunition clips or magazines meet the definition of metal boxes, or other packagings specifically designed to carry small amounts of ammunition.

This office recently contacted the Research and Special Programs Administration (RSPA) HOTLINE and asked if clips or magazines can be considered packagings for carrying small arms ammunition.

The verbal answer received from RSPA is that clips or magazines **DO** meet the requirements to be considered acceptable packagings for small arms ammunition.

I am writing to request that your office secure a written interpretation from RSPA on this matter on behalf of all regions.

Sincerely,

Robert M. Blunk

04 11 11

63012  
425 227 1700

**Requester** William Wilkening  
**Company** FAA (Dangerous Goods and Cargo Sec.  
**Phone** 202-267-9864

**Date Received:** 4/17/2001  
**Tracking Number:** 01-0093  
**Revision Date:** 6/13/2001

**Date Assigned** 4/18/2001 **Date of Letter** 4/16/2001

**Staff** Nelson **DHM** 11 **First Draft Due:** 5/9/2001

**Section** 175.10(a)(5) **First Draft Date:**

**Subject** Exceptions for Small-arms ammunition

**Concurrence** **Days to Sign** 56

**Status** CLOSED **Status Date**

**Sign/Close Date** 6/13/2001 **Signor** ETM

**HBP**  **Copy to Docket**  **Copy to DHM-60**

**Comment**

To search for on  
letters, click on t  
button below:

Check My Letters

Do you want to  
Click on the red