



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

1200 New Jersey Avenue, SE
Washington, DC 20590

SEP 2 2011

Mr. Scott Caudill
Executive Vice President
TAKATA Seat belts, Inc.
4611 Wiseman Boulevard
San Antonio, TX 78251

Ref. No.: 04-0198R

Dear Mr. Caudill:

PHMSA has determined that our November 17, 2004 response to your September 27, 2004 inquiry is incorrect. Therefore, we are revising our November 17, 2004 response pertaining to the exceptions for air bag modules under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180), as they apply to micro gas generators (pyrotechnic device) assembled into seat belt retractor or buckle sub-assemblies to correct this error.

Your letter included the following exhibits:

- Exhibit 1 (Buckle pretensioner sub-assembly);
- Exhibit 2 (Retractor pretensioner sub-assembly);
- Exhibit 3 (Buckle assembly finished good); and
- Exhibit 4 (Retractor assembly finished good).

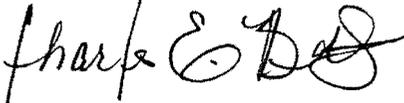
Specifically, you asked whether completed seat belt assemblies that have been approved by the Associate Administrator and classed as a "Class 9 material, UN 3268" and installed in a completed vehicle component are excepted from the requirements of the HMR in accordance with § 173.166(d)(1).

The answer is yes. An approved air bag module or seat-belt pretensioner that is installed in a completed vehicle component, such as steering columns or door panels, is not subject to any other requirements of the HMR. However, the seat belt assembly items as shown in the above

attached exhibits do not qualify for this exception, because they are not installed in a completed vehicle component and thus, are regulated as a "Class 9 material, UN3268" under the HMR for purposes of transportation in commerce.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Charles E. Betts". The signature is written in a cursive style with a large, stylized initial "C" and "B".

Charles E. Betts

Director

Standards and Rulemaking Division

Exhibit 1: Buckle pretensioner sub-assembly.
This sub-assembly has been classified
as follows:

Seat-belt pretensioner, Class 9, UN 3268, PG III

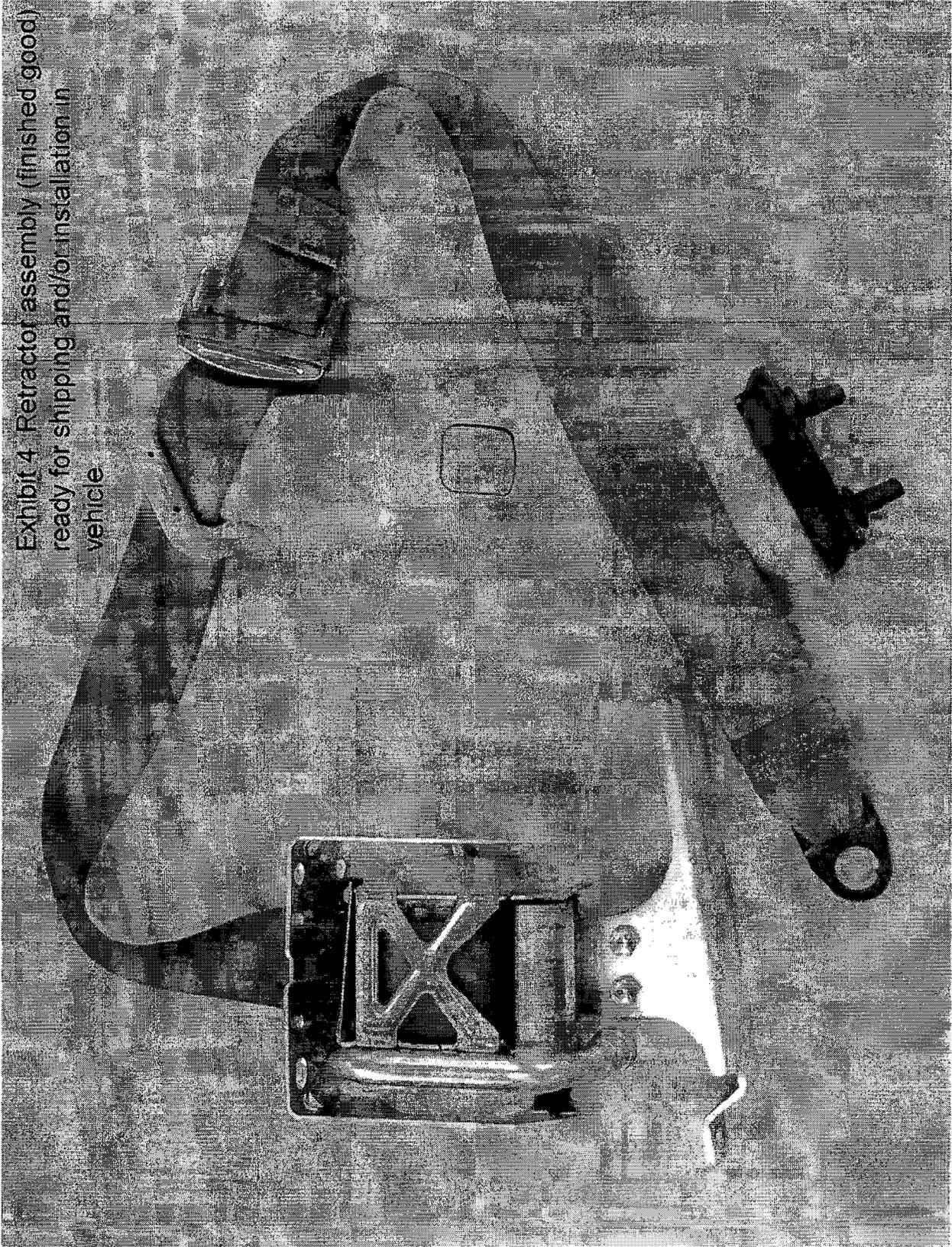


UN 3268
PG III
CLASS 9

Exhibit 3 Buckle assembly (finished good)
ready for Shipping and/or installation
in vehicle.



Exhibit 4 Retractor assembly (finished good)
ready for shipping and/or installation in
vehicle





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

400 Seventh St., S.W.
Washington, D.C. 20590

NOV 17 2004

Mr. Scott Caudill
Executive Vice President
TAKATA Seat belts, Inc.
4611 Wiseman Boulevard
San Antonio, TX 78251

Ref. No.: 04-0198

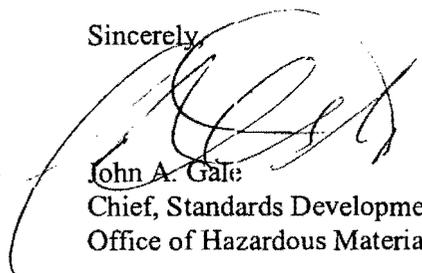
Dear Mr. Caudill:

This responds to your letter dated September 27, 2004, regarding the exceptions for air bag modules under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180), as they apply to micro gas generators (pyrotechnic device) assembled into seat belt retractor or buckle subassemblies. You enclosed Exhibits 1 (buckle pretensioner sub-assembly), 2 (retractor pretensioner sub-assembly), 3 (finished buckle assembly), and 4 (finished seat belt retractor assembly). Specifically, you asked whether the completed seat belt assemblies that have been approved by the Associate Administrator, classed as a "Class 9 material, UN 3268", and installed in a completed vehicle component are excepted from the requirements of the HMR in accordance with § 173.166(d)(1).

The answer is yes. An approved air bag module or seat-belt pretensioner that is installed in a completed vehicle component is not subject to any other requirements of the HMR. Thus, the completed seat belt assembly components (Exhibit 3, buckle assembly and Exhibit 4, retractor assembly) qualify for this exception and are not regulated under the HMR for purposes of transportation in commerce.

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

Sincerely,



John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



040198

173.166(d)(2)



TAKATA

Takata Seat Belts, Inc.

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San Antonio, Texas 78251
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*Engrain
§ 173.166 (d)(1)
Air Bags
04-0198*

September 27, 2004

Mr. Edward T. Mazzullo
Director for Office of Hazmat Standards
U.S. DOT/RSPA (DHM-10)
400 7th St., SW
Washington, D.C. 20590

Re: 49 CFR 173.166 (d) (1)

Dear Mr. Mazzullo,

Takata Seat Belts Inc. is an assembler of seat belts and buckles for the automotive industry. Takata in its array of auto components also produces pre-tensioner seat belts and buckles for the auto industry.

In the assembly process the micro gas generators (pyrotechnic device) are assembled into the seat belts retractor or buckle subassemblies. (Exhibit 1 and 2)

The seat belt retractor and buckle pre-tensioner sub-assemblies have been approved by the Associate Administrator as class 9, UN3268.

The seat belt retractor and buckle pre-tensioner sub-assemblies are completed in the final assembly process. (Exhibit 3 and 4) The vehicle components are then shipped to the OEM's for installation in automobiles.

TSBI is of the opinion that the completed seat belt assemblies (Exhibit 3 and 4) are vehicle components and qualify for the exception 49 CFR 173.166 (d) (1), which states;

"An air bag module or seat-belt pretensioner that has been approved by the Associate Administrator and is installed in a motor vehicle or in completed vehicle components such as steering columns or door panels is not subject to the requirements of this subchapter."

Inert samples of these components are available at your request.

Please review and advise at your earliest convenience.

Sincerely yours,

Scott E. Caudill
Executive Vice President
Takata Seat Belts Inc.