



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

**April 18, 2025**

1200 New Jersey Avenue, SE  
Washington, DC 20590

DOT-SP 21447  
(FIRST REVISION)

**EXPIRATION DATE: 2029-03-31**

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: SubCtech GmbH  
Kiel, Germany

US AGENT: Electronic Sales of New England  
Old Saybrook, CT

2. PURPOSE AND LIMITATION:

a. This special permit authorizes the transportation in commerce of certain low production lithium ion batteries weighing greater than 35 kg aboard cargo-only aircraft. This special permit provides no relief from the Hazardous Materials Regulations (HMR) or the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO TI) other than as specifically stated herein. The most recent revision supersedes all previous revisions.

b. The safety analyses performed in the development of this special permit only considered the hazards and risks associated with the transportation in commerce.

c. No party status will be granted to this special permit.

d. This special permit serves as an approval under Special Provision A88 and State Variation US 3 of the ICAO TI and as a "Competent Authority Approval" as defined under 49 CFR § 107.1.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

Tracking Number: 2024125178

4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 172.101 Hazardous Materials Table Column (9B) in that a lithium battery may exceed 35 kg and § 173.185(a)(1) in that lithium batteries have not passed the criteria in Part III, subsection 38.3 of the UN Manual of Tests and Criteria.
5. BASIS: This special permit is based on the application of SubCtech GmbH dated December 18, 2024, submitted in accordance with § 107.109.
6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Lithium ion batteries <i>including lithium ion polymer batteries</i>	9	UN3480	N/A

7. SAFETY CONTROL MEASURES:

a. PACKAGING:

(1) Inner Packaging:

- (i) Each battery must be individually packaged in a metal pressure housing or a dangerous goods bag that fully encloses the battery.
- (ii) Each battery must be packaged in a manner to prevent shifting, accidental activation, short circuiting, and vibrations during transport.

(2) Outer Packaging:

- (i) Each inner packaging must be completely surrounded by sufficient non-combustible and non-conductive thermal insulation material.
- (ii) Outer packaging must meet the Packing Group I standard.

(3) Lithium batteries must be packaged and prepared in accordance with Packing Instruction 910 of the Supplement to the ICAO TI.

(4) The state of charge for low production lithium ion batteries may not exceed 30% when offered for transportation.

(5) A battery with a net mass of more than 30 kg must be limited to 1 battery per outer packaging.

b. TESTING:

(1) Authorized lithium ion cells (listed below) must be of a type that has successfully passed the required tests in accordance with the 38.3 of the UN Manual of Tests and Criteria:

Number	Model	Energy Max Rating
1.1	LG INR18650B4	9.36 Wh
1.2	Panasonic NCR18650B	12.06 Wh
1.3	LG INR18650M26	9.36 Wh
1.4	LG INR18650MH1	11.74 Wh
1.5	Sony US18650VTC6	11.23 Wh
1.6	Lithium Werks ANR26650M1-B	8.25 Wh
1.7	BAK N18650CP	12.06 Wh

(2) Any changes to the battery cells from the tested types listed above, invalidates this special permit.

c. OPERATIONAL CONTROLS:

(1) Authorized batteries are those listed in the September 15, 2022, application on file with the Office of Hazardous Materials Safety (OHMS). Any battery that differs from the list in the September 15, 2022, application on file with OHMS invalidates this special permit.

(2) Only low production lithium ion batteries may be offered for transportation under the terms of this special permit. ("Low production" is defined as annual production runs of no more than 100 batteries.). Annual production runs of more than 100 batteries invalidates this special permit.

(3) Each battery must be equipped with the means to prevent reverse current flow.

(4) Cells or batteries that are leaking or liable to rapidly disassemble, dangerously react produce a flame or a dangerous evolution of heat or a dangerous emission of toxic, corrosive, or flammable gases, or vapors under normal conditions of transport may not be transported under this special permit.

(5) Only one battery per package is authorized.

d. MARKINGS: Each package must be marked with the special permit number, "DOT-SP 21447" in accordance with § 172.301(c).

8. SPECIAL PROVISIONS:

a. Under the terms of this special permit, the grantee may only offer hazardous materials (i.e., the grantee is not authorized as a carrier).

b. A person who is not a holder of this special permit who receives a package covered by this special permit may reoffer it for transportation provided no modification or change is made to the package or its contents and it is reoffered for transportation in conformance with this special permit, the HMR, and the ICAO TI.

c. A current copy of this special permit must be maintained at each facility where the package is offered or reoffered for transportation.

d. This special permit in no way affects the need to obtain any required authorizations from other agencies of the United States Government or from the competent authorities of countries of origin, transit, destination, or State of the Operator.

e. The special permit holder must maintain a record of all activity conducted under the authority granted in this special permit. The record must contain a complete listing and number of shipments made to include and upon request make this information available to a DOT representative or an enforcement official. The record must contain a listing and number of shipments made to include:

(1) Dates of shipment; and

(2) Description of each type of shipment.

9. MODES OF TRANSPORTATION AUTHORIZED: Cargo-only aircraft.

10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each aircraft used to transport packages covered by this special permit. The shipper must furnish a copy of this special permit to the air carrier before or at the time the shipment is tendered.
11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this special permit and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. 5101 et seq:
  - o All terms and conditions prescribed in this special permit and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
  - o Persons operating under the terms of this special permit must comply with the security plan requirement in Subpart I of Part 172 of the HMR, when applicable.
  - o Registration required by § 107.601 et seq., when applicable.

Each “Hazmat employee”, as defined in § 171.8, who performs a function subject to this special permit must receive training on the requirements and conditions of this special permit in addition to the training required by §§ 172.700 through 172.704.

No person may use or apply this special permit, including display of its number, when this special permit has expired or is otherwise no longer in effect.

Under Title VII of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) —“The Hazardous Materials Safety and Security Reauthorization Act of 2005” (Pub. L. 109-59), 119 Stat. 1144 (August 10, 2005), amended the Federal hazardous materials transportation law by changing the term “exemption” to “special permit” and authorizes a special permit to be granted up to two years for new special permits and up to four years for renewals.

12. **REPORTING REQUIREMENTS:** Shipments or operations conducted under this special permit are subject to the Hazardous Materials Incident Reporting requirements specified in 49 CFR §§ 171.15 - Immediate notice of certain hazardous materials incidents, and 171.16 - Detailed hazardous materials incident reports. In addition, the grantee(s) of this special permit must notify the Associate Administrator for Hazardous Materials Safety, in writing, of any incident involving a package, shipment or operation conducted under terms of this special permit.

Issued in Washington, D.C.:



for William Schoonover  
Associate Administrator for Hazardous Materials Safety

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Pipeline and Hazardous Material Safety Administration, U.S. Department of Transportation, East Building PHH-13, 1200 New Jersey Avenue, Southeast, Washington, D.C. 20590.

Copies of this special permit may be obtained by accessing the Hazardous Materials Safety Homepage at <https://www.phmsa.dot.gov/approvals-and-permits/hazmat/special-permits-search>. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

PO: Jephthah Nti