



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

July 18, 2025

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 21956

EXPIRATION DATE: 2027-06-30

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Zoox, Inc.
Foster City, CA
2. PURPOSE AND LIMITATION:
 - a. This special permit authorizes the transportation in commerce of lithium ion batteries and batteries contained in equipment exceeding 35 kg via 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 A99 and Packing Instruction 974 of the ICAO TI, 49 CFR § 173.185(b)(5) 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.
4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 172.101 Hazardous Materials Table Column (9B) in that a battery may not exceed 35 kg when transported aboard aircraft, except as specified herein.
5. BASIS: This special permit is based on the application of Zoox, Inc. dated February 14, 2025, submitted in accordance with § 107.105 and the public proceeding thereon.

Tracking Number: 2025034185

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
Lithium ion batteries contained in equipment <i>including lithium ion polymer batteries</i>	9	UN3481	N/A

7. SAFETY CONTROL MEASURES:a. PACKAGING:

(1) Battery Pack:

- (i) Each battery pack which has a mass of 12 kg or greater must have a strong, impact-resistant outer aluminum casing;
- (ii) The battery pack must be packed in a UN 50D plywood box that meets Packing Group I performance criteria;
- (iii) Not more than one battery pack is allowed per package; and
- (iv) The net weight of the battery within the package may not exceed 400 kg (882 pounds).

(2) Battery Pack contained in Equipment (Drive Module):

- (i) Each battery pack must be contained in equipment (drive module of an electric vehicle) designed for vehicle application and constructed of suitable material of adequate strength and design.
- (ii) The battery pack contained (installed) in equipment must be placed within a strong wooden crate;
- (iii) The aggregate net weight of a battery pack in contained in equipment may not exceed 400 kg (882 pounds).

- (iv) Not more than one battery pack is allowed per package.

b. TESTING:

(1) Each cell within the battery packs and batteries contained in equipment must be of a type tested in accordance with the UN Manual of Tests and Criteria, 6th Revised Edition.

(2) The battery packs and batteries contained in equipment must be of a type tested in accordance with the UN Manual of Tests and Criteria, 7th Revised Edition.

c. OPERATIONAL CONTROLS:

(1) The nominal watt-hour rating of a battery pack comprised of multiple battery modules as described in the February 14, 2025 Zoox's application and which is on file with the Office of Hazardous Materials Safety may not exceed the kWh provided in the application.

(2) The state of charge for lithium ion battery packs and batteries contained in equipment must be not more than 30% when offered for aircraft transportation.

(3) Each battery pack and battery pack contained in equipment must be equipped with a battery management system capable of preventing overcharge, short-circuiting, and over discharge.

(4) Lithium ion cells, the battery packs, and batteries contained in equipment must be protected against short-circuiting.

(5) The battery packs and batteries contained in equipment must be equipped with an effective means of preventing dangerous reverse current flow when a battery pack contains cells or modules that are connected in parallel.

(6) Packaging must comply with the requirements in Packing Instruction 974 of the Supplement to the ICAO TI. Additionally, waste lithium modules and batteries and lithium modules and batteries being shipped for recycling or disposal are forbidden from air transport, and lithium ion modules and batteries must not be packed in the same outer packaging with substances and articles of Class 1 (explosives) other than Division 1.4S, Division 2.1 (flammable gases), Class 3 (flammable liquids), Division 4.1 (flammable solids) or Division 5.1 (oxidizers).

d. MARKING: Each package, and overpack if used, prepared under the provisions of this special permit must be plainly marked with the special permit number "DOT-SP 21956".

8. SPECIAL PROVISIONS:

a. 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 and the HMR.

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

c. 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, and the State of Operator.

d. The grantee must maintain the following record and upon request make this record available to DOT representatives or enforcement officials. 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 cargo-only aircraft. 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 Quade
Acting 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: SH/TG