



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

July 17, 2026

1200 New Jersey Avenue, SE
Washington, DC 20590

DOT-SP 22344

EXPIRATION DATE: 2028-06-30

(FOR RENEWAL, SEE 49 CFR 107.109)

1. GRANTEE: Space BD Inc.
Tokyo, Japan

US AGENT: ShipMate, Inc.
Sisters, OR

2. PURPOSE AND LIMITATION:

a. This emergency special permit authorizes the transportation in commerce of prototype lithium ion batteries contained in equipment (satellite), which have not passed the criteria in Part III, subsection 38.3 of the UN Manual of Tests and Criteria. This special permit provides no relief from the Hazardous Materials Regulations (HMR) or the International Civil Aviation Organization's Technical Instructions for the Safe Transportation 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. This special permit serves as an approval under Special Provision A88 and State Variation US 3 of the ICAO TI, Supplement Doc 9284 AN/905, and as a "Competent Authority Approval" as defined under 49 CFR § 107.1

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

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

Tracking Number: 2026074465

4. REGULATIONS FROM WHICH EXEMPTED: 49 CFR § 173.185(a)(1) in that the prototype and low production lithium ion batteries have not passed the criteria in Part III, subsection 38.3 of the UN Manual of Tests and Criteria.
5. BASIS: This emergency special permit is based on the application of Space BD Inc. dated July 9, 2026, submitted in accordance with § 107.117 and the determination it was necessary to prevent significant economic loss.
6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous Materials Description			
Proper Shipping Name	Hazard Class/ Division	Identification Number	Packing Group
Lithium ion batteries contained in equipment <i>including lithium ion polymer batteries</i>	9	UN3481	N/A

7. SAFETY CONTROL MEASURES:
- a. PACKAGING: Two batteries contained in equipment (satellite) must be packaged as follows:
- (1) Inner Packaging: The equipment (FUNADE satellite, as described in the July 9, 2026, application on file with the Office of Hazardous Materials Safety (OHMS)) containing the batteries must be surrounded by cushioning material that is non-combustible and electrically non-conductive and is then tightly placed in a non-metallic inner packaging (Pelican or Valigia 7726 Case).
- (2) Outer Packaging: The inner packaging must be placed into a UN Specification 4G or 4D outer packaging that meets the Packing Group I performance level. The total gross mass of the package must not exceed the gross mass for which the design type has been tested.
- (3) Each battery must be designed for space application and constructed of suitable material of adequate strength and design, as described in the July 9, 2026, application on file with OHMS.
- (4) The aggregate net weight of each battery must not exceed 623 g (1.4 pounds) and each package may contain not more than two (2) batteries.

(5) Each package must meet all additional applicable requirements in Packing Instruction 910 of Supplement to the ICAO TI.

b. TESTING:

(1) Each cell (INR19/66) within the battery must be of a type tested in accordance with the UN Manual of Tests and Criteria, 6th Revised Edition.

(2) The prototype battery may not be of a type tested in accordance with the UN Manual of Tests and Criteria.

c. OPERATIONAL CONTROLS:

(1) Only prototype and low production lithium ion batteries may be offered for transportation under the terms of this special permit. ("Low production" is defined as a production run of no more than 100 cells or batteries annually of a particular type).

(2) Each battery is comprised of not more than six (6) cells (10.8V nominal voltage, 7000 mAh per cell), connected in a 2P3S configuration.

(3) Each battery must comply with all the conditions of this special permit prior to being offered for transportation.

(4) Cells and batteries must be protected against short circuiting and unintentional activation.

(5) The batteries must be equipped with an effective means of preventing dangerous reverse current flow for strings that contain cells connected in parallel.

(6) All lithium ion batteries must be offered for transportation at a state of charge not exceeding thirty (30) percent.

d. MARKING: The outer transport container must be plainly and durably marked on two opposite sides in letters at least 2 inches (50 mm) in height on a contrasting background, "DOT-SP 22344" and "DO NOT STACK" as specified in 49 CFR § 173.301(c).

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. The grantee must maintain a record of all activity conducted under the authority granted in this special permit and upon request make this information 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: Motor vehicle and cargo-only aircraft.
10. MODAL REQUIREMENTS: A current copy of this special permit must be carried aboard each aircraft and motor vehicle 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 Quade
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: Steve H/BB