



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 3, 2025

Eva Glimsche
ABS All Battery Service GmbH
Sperberstraße 50e
81827 Munich, Germany

Reference No. 24-0094

Dear Ms. Glimsche:

This letter is in response to your October 15, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to lithium battery test reports. Specifically, may a manufacturer redact some information from a lithium battery test report and does the lithium battery test report example included with your email provide the necessary information to meet the requirements in 49 CFR § 173.185(a)(3)?

The HMR do not prohibit redaction of some information from lithium battery test reports; however, the full lithium battery test report must be made available by the manufacturer to an authorized representative of the Federal, state, or local government upon request—see 49 CFR § 173.185(a)(2)(ii). In addition, as required by 49 CFR § 173.185(a)(3), each manufacturer and subsequent distributor must make available a lithium battery test summary that includes the following elements:

- Name and address of the cell, battery, or product manufacturer including address, telephone, email, and website;
- Name and address of the test facility including address, telephone, email, and website;
- A unique test report number;
- Date of the test report;
- Cell or battery description including if the battery is lithium ion or lithium metal, the battery's mass, watt-hour rating or lithium content, physical description of the cell/battery, and model number;
- List of tests conducted;
- Reference to assembled battery testing requirements, when applicable;
- Edition of United Nations Manual of Tests and Criteria used; and
- Name and title of responsible person.

Upon review, it appears that the redacted lithium battery test provided with your email is incomplete. Required information such as the test report number, name of testing laboratory, and name and title of responsible person are redacted.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "T. Glenn Foster". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Request for a written letter of clarification
Date: Tuesday, October 15, 2024 4:54:38 PM
Attachments: [PHMSA-UN383-test-summary-with-two-mistakes-anonymized-2024-10-15.png](#)

Hello Alice,

Please see the below interpretation request. Let us know if you need anything.

Sincerely,
Janaye

From: Eva Glimsche <eva.glimsche@lithium-battery-service.de>
Sent: Tuesday, October 15, 2024 4:17 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: Request for a written letter of clarification

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear PHMSA team,

we were asked by one of our customers to check a UN 38.3 test summary for plausibility and completeness.

The battery manufacturer is seated in the USA.

When doing so we had two findings:

1. The version given in the UN 38.3 test summary did not match the version of the Manual of Tests and Criteria that was valid at the date of testing.

We did request the battery manufacturer to correct the UN 38.3 test summary and we received the reply that the battery was tested according to 7th revised edition even if the test report was from 2023.

2. No test institute was entered in the UN 38.3 test summary we received.

Asking for the test institute we received the following statement:

"To clarify, that information does need to be passed on to regulatory authorities requesting the summary like, the FAA, IATA, etc but, it does not need to be passed on to anyone else, at our discretion. If any of those agencies need a non-redacted copy, they will ask us for one. At that point, we have a "reasonable" amount of time to provide the document to them, per part 4, section H of the document you sent me. Nobody else needs a non-redacted copy for any reason.

If you are requesting this document from us for transportation purposes, the copy I sent you will

satisfy the transporters, as they do not need a non-redacted copy. I hope that helps."

Now we would like a written letter of clarification whether the statements this battery manufacturer made under list point 1 and under list point 2 reflect the PHMSAs point of view.

For reference I have attached the anonymized version of the UN 38.3 test summary we received as document

PHMSA-UN383-test-summary-with-two-mistakes-anonymized-2024-10-15

Thank you very much for looking into this.

Best regards,

Eva Glimsche

	UN38.3 Lithium Battery Test Summary Model: Li-ion 25000 14S5P 50.4v Battery Pack
1	Product Manufacturer [REDACTED]
2	Product Manufacturer Contact Information [REDACTED]
3	UN38.3 Test Lab Confidential and proprietary [REDACTED] information
4	Test Report Number [REDACTED]
5	Date of Test Report 03.06.2023
6	Description of Cell or Battery Li-ion battery [REDACTED]
7	UN38.3 Tests Performed and Successfully Passed T.1, T.2, T.3, T.4, T.5, T.7. (Note that T.6 and T.8 are not applicable to batteries, only cells)
8	Assembled Battery Testing Requirements Not Applicable
9	Edition of UN Manual of Tests and Criteria Used Rev. 7
10	Name and Title of Signatory [REDACTED]

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