Horne, T.
25-0069

From: INFOCNTR (PHMSA)
To: Baker, Yul (PHMSA)
Cc: Hazmat Interps
Subject: FW: SoC for vehicles in air transport from 2026 onwards [Interpretation Request]
Date: Friday, May 16, 2025 13:35:41

Hi Yul,

Please see the below interpretation request.

Let me know if you need anything,

-Breanna

From: Eva Glimsche <eva.glimsche@lithium-battery-service.de>
Sent: Friday, May 16, 2025 7:27 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: SoC for vehicles in air transport from 2026 onwards

Dear PHMSA team,

today we received the following questions from one of our customers:
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Hi DG Team,

just received the following request from a customer:
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We would like to tap into your expertise:

We have been looking closely at the new 'state of charge' requirement in the current IATA DGR for VA952.

We have the following understanding and questions:

· From 1 January 2026: Vehicles with batteries >100Wh must meet the charge status requirement (VA952, section (b) 4. (ii) (a)).

o Are we correct in understanding that this refers exclusively to drive batteries?

o If so, does this mean that section (b) 4. (ii) (b) refers exclusively to vehicles with drive batteries <=100Wh? This would then only apply to 'toy vehicles'.

o If not, this would mean that all installed batteries >100Wh must meet the charge

status requirement. This raises the following question for us:

§ The state of charge of some batteries cannot be read/determined and cannot be manipulated from the outside, as the state of charge is controlled by control units (e.g. battery management for 12V/48V on-board batteries). How should we proceed in this case?

o If not, would this also mean that all installed batteries <=100Wh should meet the charge status requirement? This raises the following question for us:

§ The charge status of some batteries cannot always be determined or manipulated from outside (e.g. the tablet is automatically charged in the rear seat entertainment system when it is in the holder). How should this be handled?

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I would say that the SoC reduction is for the traction battery only. Are you of the same opinion?

Please provide me with a written interpretation.

Looking forward to hearing from you.

Best regards,

Eva

Eva Glimsche
ABS All Battery Service GmbH
Sperberstr. 50e – 81827 Munich - Germany
Office +49 - 89 - 43579624
Mobile +49 - 171 – 4958177
eva.glimsche@lithium-battery-service.com
www.lithium-battery-service.com

CEO: Eva Glimsche and Jürgen Werny
Registered office: Munich
Commercial Register: Amtsgericht München (district court Munich) HRB 296612

Newsletter

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