

**From:** [Eva Glimsche](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Cc:** [eva.glimsche@lithium-battery-service.com](mailto:eva.glimsche@lithium-battery-service.com); [Pollack, Arthur \(PHMSA\)](#); [Foster, Glenn \(PHMSA\)](#)  
**Subject:** Re: Interpretation Final Response PHMSA 24-0094  
**Date:** Monday, June 30, 2025 6:49:44 AM

Some people who received this message don't often get email from [eva.glimsche@lithium-battery-service.de](mailto:eva.glimsche@lithium-battery-service.de).  
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Dear Alice,

for a customer I just went to your response and reading it again I decided that I need to ask the question once more providing you with the original document we received.

Please review the attached document regarding the questions:

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."

Could you please review your written letter of interpretation PHMSA 24-0094 on whether the statements this battery manufacturer made under list point 1 and under list point 2 reflect the PHMSAs point of view.

Specifically whether the wrong information on the Manual of Tests and Criteria would be a „Stop“ on buying and on shipping that product and whether to enter „Confidential and proprietary MaxAmps information“ for UN 38.3 Test Lab would be an example of redaction that would be OK for PHMSA.

Please keep the information on the manufacturer confidential when writing your response.

Thank you very much.

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

### **Social Media**

We sure enjoy keeping in touch! You can do so via Facebook, LinkedIn, Pinterest, Tumblr, Twitter or Xing.

### **Newsletter**

You want to receive updates on new and changed regulations on the transport of lithium cells and batteries?

Via this link you can sign up for our newsletter service:

<https://www.lithium-batterie-service.de/en/newsletter/>

### **Here you can meet us Online:**

<https://www.lithium-batterie-service.de/en/learning-opportunities/>

Am 03.04.2025 um 20:06 schrieb Dodd, Alice (PHMSA) <Alice.Dodd@dot.gov>:

Dear Eva Glimsche,

Please find attached our response to your request for a letter of clarification regarding the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) under tracking number 24-

0094.

Please submit any additional questions to our Hazmat Info Center at [Infocntr@dot.gov](mailto:Infocntr@dot.gov).

Cordially,

*Alice Dodd*

Administrative Assistant, Hazmat Standards

US Department of Transportation

**Pipeline and Hazardous Materials Safety Administration**






1200 New Jersey Ave S.E. Washington, D.C. 20590

Office: 202-366-9141

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<[image001.jpg](#)>

<24-0094.pdf>

	<b>UN38.3 Lithium Battery Test Summary</b> <b>Model: Li-ion 25000 14S5P 50.4v Battery Pack</b>
<b>1</b>	<b>Product Manufacturer</b> 
<b>2</b>	<b>Product Manufacturer Contact Information</b> 
<b>3</b>	<b>UN38.3 Test Lab</b> Confidential and proprietary  information
<b>4</b>	<b>Test Report Number</b> 
<b>5</b>	<b>Date of Test Report</b> 03.06.2023
<b>6</b>	<b>Description of Cell or Battery</b> Li-ion battery 
<b>7</b>	<b>UN38.3 Tests Performed and Successfully Passed</b> 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)
<b>8</b>	<b>Assembled Battery Testing Requirements</b> Not Applicable
<b>9</b>	<b>Edition of UN Manual of Tests and Criteria Used</b> Rev. 7
<b>10</b>	<b>Name and Title of Signatory</b> 