

Southwest Airlines Co.
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Casey, C.
25-0120

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Pipeline and Hazardous Materials Safety Administration
Standards and Rulemaking Division
ATTN: PHH-10
U.S. Department of Transportation
East Building
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: Interpretation Letter Request

I am writing to obtain clarification regarding the acceptance of a battery powered heat-producing device and onboard use based on 49 CFR Part 175.10(a)(14)

A prior interpretation letter (10-0267) mentioned a heat-producing device would be one that produced an amount of heat sufficient to be a source of ignition. 175.10 also mentions unintentional activation. The below questions are regarding a food warmer that would not produce enough heat to be a source of ignition and would be intentionally activated.

Would a lithium-ion battery operated food warmer be considered a portable electronic device?

Would 175.10(a)(14) prohibit a passenger or crewmember from using a lithium-ion battery operated food warmer that is intentionally activated to warm their food during flight?

Thank you for your assistance in this matter. Feel free to contact me at Todd.Hargrove@wnco.com or 469-603-4813 if further clarification is needed.

Sincerely,

Todd Hargrove
Hazardous Materials Program Manager

Addressee Name

Letter Date

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