

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Request for Clarification on Special Provision 160 - Test Series 6(c)
Date: Wednesday, December 3, 2025 12:23:41

Hi Yul,

Please see the below interpretation request.

Let us know if you need anything,

-Breanna

From: PHMSA Pipelinesafety <PHMSA.Pipelinesafety@dot.gov>
Sent: Wednesday, December 3, 2025 9:27 AM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Subject: FW: Request for Clarification on Special Provision 160 - Test Series 6(c)

Good morning,

Please find the inquiry below.

Thank you!
Jessica

From: Soonae.Shim <soonae_shim@ashimori.co.kr>
Sent: Wednesday, December 3, 2025 4:19 AM
To: PHMSA Pipelinesafety <PHMSA.Pipelinesafety@dot.gov>; hmregs@dot.gov; phmsa-info@dot.gov
Subject: Request for Clarification on Special Provision 160 - Test Series 6(c)

soonae_shim@ashimori.co.kr이/그녀의 전자 메일을 받지 못하는 경우가 많습니다. [이 문장과 관련된 이유](#)

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Dear PHMSA Hazardous Materials Information Center,

I hope this message finds you well.

We are a manufacturer of airbag and seatbelt modules in South Korea.
I am writing to request an official interpretation regarding 49 CFR 172.102, Special Provision 160.

According to the regulation, safety devices such as air bag inflators, air bag modules, seat-belt pretensioners, and pyromechanical devices containing Class 1 (explosive) materials must be tested in accordance with Test Series 6(c) of Part I of the UN Manual of Tests and Criteria.
The provision further states that if the air bag inflator unit satisfactorily passes the Series 6(c) test, it is not necessary to repeat the test on the air bag module.

I have the following questions regarding this provision:

- If an air bag inflator has successfully passed the Series 6(c) test, does this exemption apply only to the air bag module, or does it also extend to seat-belt pretensioners use the same inflator?
- In other words, must the airbag module that utilizes the inflator undergo the Series 6(c) test again?

- Do seatbelt pretensioners need to undergo a separate Series 6(c) test, or can they be exempted if the inflator has already passed the test?

Your clarification on this matter would be greatly appreciated to ensure our compliance with the Hazardous Materials Regulations.

Thank you for your assistance.



심순애
SOON-AE SHIM

책임매니저
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S

Let's **Start now!**
지금 시작하자!