



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

January 16, 2026

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

Reference No. 25-0087

Dear Ms. Glimsche:

This is in response to your June 30, 2025 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to lithium battery test reports. Specifically, you request that we revisit a previously issued Letter of Interpretation (Reference No. 24-0094), which concerns the manufacturer redacting information from a lithium battery test report. You ask if the lithium battery test report example included with your email provides the necessary information to meet the requirements in § 173.185(a)(3)?

No. As stated in the previous request, 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 § 173.185(a)(2)(ii). In addition, as required by § 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 (UN) Manual of Tests and Criteria used; and
- Name and title of responsible person.

Upon review—though the lithium battery test summary provided with your latest email is now unredacted—it remains incomplete. The name of the testing laboratory—as specified in § 173.185(a)(3)(iii)—is still missing. Finally, regarding your concerns about the edition of the UN Manual of Tests and Criteria used, under the HMR, the edition provided in the report was the version in effect at the time the test was performed.

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 "Alexander Wolcott". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alexander Wolcott
Acting Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

Enclosure:

- Copy of LOI Reference No. 24-0094



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: [Eva Glimsche](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: 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.
[Learn why this is important](#)

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 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.

Cordially,

Alice Dodd

Administrative Assistant, Hazmat Standards

US Department of Transportation

Pipeline and Hazardous Materials Safety Administration


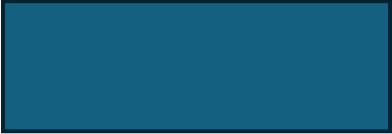



1200 New Jersey Ave S.E. Washington, D.C. 20590

Office: 202-366-9141

[PHMSA Home](#) | [LinkedIn](#) | [Twitter](#) | [HAZMAT](#) | [OPS](#)

<image001.jpg>

<24-0094.pdf>

UN38.3 Lithium Battery Test Summary Model: Li-ion 25000 14S5P 50.4v Battery Pack	
1	Product Manufacturer 
2	Product Manufacturer Contact Information 
3	UN38.3 Test Lab Confidential and proprietary  information
4	Test Report Number 
5	Date of Test Report 03.06.2023
6	Description of Cell or Battery Li-ion battery 
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 