



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

July 8, 2026

Soon-Ae Shim
Senior Manager
Ashimori
(Sinpyeong-ri) 134 Dowon-ro, Jijeong-myeon, Wonju-si
Gangwon-do, Korea 26351

Reference No. 25-0157

Dear Ms. Shim:

This letter is in response to your December 3, 2025 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to safety devices. Specifically, you ask whether the testing exception in 49 CFR 172.102, Special Provision 160 applies to seatbelt pretensioners that contain a tested airbag inflator.

No. Special Provision 160 states that “if the airbag inflator unit satisfactorily passes the series 6(c) test, it is not necessary to repeat the test on the airbag module.” This exception is not extended to seatbelt pretensioners even if they use a tested inflator. For a hazardous material assigned Special Provision 160, the series 6(c) test must be repeated for other devices, except on the airbag module when the airbag inflator has already passed the test.

Further, 49 CFR 173.166(d)(2) specifies an additional requirement, in that the airbag modules still must be examined for situations where the airbag inflator was approved as Class 9 but depended upon packaging or other special means specified by the authorized testing agency to obtain this classification. This regulatory requirement is necessary to separately assess the hazards of the module and whether it also requires a specific packaging configuration to meet the criteria for Class 9.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

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

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.kr의 메시 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
SENIOR MANAGER

프로젝트관리팀 | Project Management Team

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Let's **Start now !**

지금 시작하자 !