



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

OCT 11 2018

Tim Morgan  
Ingram  
1451 All Points Court  
Plainfield, IN 46168

Reference No. 18-0084

Dear Mr. Morgan:

This letter is in response to your June 4, 2018, email and subsequent phone conversations requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the lithium battery mark. Specifically, you ask if the lithium battery mark in § 173.185(c)(3) may be modified to include supplementary information in addition to the required UN identification number and phone number.

The answer is no. The purpose of the marking is to indicate that the package contains lithium batteries in a clear and universal way. Changes to the marking could diminish the effectiveness of the lithium battery mark and cause confusion in transportation. Therefore, the lithium battery mark may not be modified to include additional information to that which is required in § 173.185(c)(3).

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

Sincerely,

A handwritten signature in cursive script that reads "T. Glenn Foster".

T. Glenn Foster  
Chief, Regulatory Review and Reinvention  
Standards and Rulemaking Division

Wolcott  
Batteries  
18-0084

**January, Ikeya CTR (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Monday, June 04, 2018 9:52 AM  
**To:** Hazmat Interps  
**Subject:** FW: Request for Interpretation

Good morning Alice and Ikeya,

Please see the below interp request. The requestor already spoke to Andrew here in the InfoCenter, but has requested further interpretation.

Regards,

-Breanna

**From:** Morgan, Timothy [mailto:Timothy.Morgan@Ingrammicro.com]  
**Sent:** Friday, June 01, 2018 4:15 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for Interpretation

To Whom It May Concern,

Can you please clarify whether the design for the lithium battery mark (§173.185(c)(3)) prohibits any information in addition to the required UN number and telephone number for additional information?

My address is included below.

Thank you,  
Tim

—  
**Tim Morgan, CHMM**  
Transportation HazMat/Dangerous Goods Project Manager  
*Commerce & Lifecycle Services*  
Office: 317.707.2496 | Mobile: 317 750.4444



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1451 All Points Court  
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