



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

SEP 25 1998

Anthony P. Willson
Toyota Motor Sales, U.S.A., Inc.
P.O. Box 2991
Torrance, CA 90509-2991

Ref. No. 98-0277

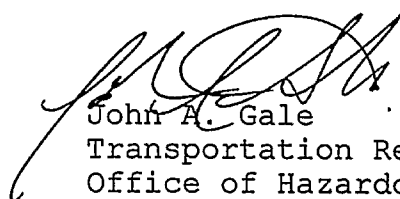
Dear Mr. Willson:

This is in response to your letter dated September 9, 1998, concerning the gross weight marking on a specification packaging under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if packages may contain less weight than the gross mass which is marked on the packaging.

Section 178.503 specifies the markings which must appear on a UN standard packaging. For packagings intended to contain solids or inner packagings, the designation of the mass of the packaging must be the maximum gross mass in kilograms for which that packaging has been tested (178.503(a)(4)(ii)). The gross weight of the package must not exceed the maximum gross mass printed on the box. Therefore, packagings may contain materials in amounts less than specified in the printed markings.

I hope the satisfies your request.

Sincerely,



John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

178.503



BAH
\$ 178.503

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September 9, 1998



Mr. Edward Mazzullo
Director
Office of Hazardous Material Standards
700 7th Street S. W.
Washington, DC 20590

Dear Mr. Mazzullo:

Toyota Motor Sales, USA receives parts from Japan that are Seat Belt Pre-tensioners and Air Bag Modules, Class 9, UN3268, packing group III. These parts have a gross weight of 2.27 kg or 2.50 kg. The UN specification printed on the box is 3.0 kg.

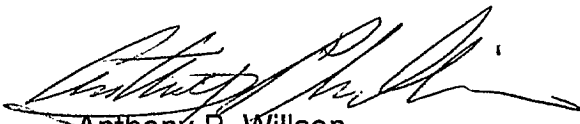
Currently we are adjusting the gross weight on the boxes received from our Japan suppliers to the exact gross weight.

We received two different answers to our verbal inquiries regarding this matter. One answer, from our outside consultant, Steven Hunt of ShipMate, is that the gross weight must be exact. The answer from Mike Johnson at the DOT was that the gross weight cannot exceed that which is printed on the box.

Since we ship these parts to facilities within the United States we would like to know which is correct for transport within the United States.

I would appreciate a phone call on this issue. Please call me at 310-787-5701. If I am not in please leave a voice mail message. A written response is also requested.

Sincerely,



Anthony P. Willson
Sr. Logistics Administrator
Mail Stop G-401