



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

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

APR 2 1999

Mr. Steve Farrar
National Technical Systems
National Ordnance, Munitions
and Environmental Test Center
P.O. Box 3315
East Camden, AR 71701

Ref. No. 99-0042

Dear Mr. Farrar:

This is in response to your letter of February 10, 1999, requesting clarification on the requirements for lithium batteries under the Hazardous Materials Regulations (HMR; 49 CFR parts 171-180). Specifically you ask whether a 32 volt lithium battery must be subjected to the tests in the UN Manual of Tests and Criteria, specifically paragraph 38.3.4.3.2.2.3.

The answer is no. A lithium battery that exceeds the referenced nominal voltage is not subject to those tests. Such a battery would have each cell tested rather than the entire battery.

I hope this information is helpful.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



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