



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

JUL 18 2014

Mr. Jürgen Tröscher M.A.  
Supply Chain Manager  
iSi Automotive Austria GmbH  
Scheydgasse 30-32  
1210 Vienna  
Austria

Reference No. 13-0225

Dear Mr. Tröscher:

This is in response to your November 20, 2013 email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to air bag inflators and air bag modules. In your letter, you state that you have air bag inflators which have received an explosive (EX) approval from the Associate Administrator of the Pipeline and Hazardous Materials Safety Administration (PHMSA). You state that the air bag inflators, approved with specific packaging instructions for the inner and outer packaging, are assembled into an air bag module. You further state that this air bag module, with the installed inflator, will not fit into the approved packaging for the air bag inflator. You ask whether the previously approved air bag inflator can be installed in a module, then shipped in a package listed in § 173.166(e).

The answer is no. When an EX approval associated with an air bag inflator has no prescribed packaging indicated, then either the air bag inflator or air bag module with the inflator would be permitted to be placed in a packaging listed in § 173.166(e). However, since the air bag inflator you describe has an EX approval letter that requires a prescribed packaging instruction, the air bag inflator cannot be assembled into an air bag module and shipped in a package listed in § 173.166(e). In this case, the air bag module with inflator can only be shipped in accordance with the specified packaging in the EX approval. To ship the air bag inflator installed in an air bag module in packaging other than that prescribed in the EX approval, a new or modified EX approval would be required.

I hope this satisfies your request.

Sincerely,

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

Drakeford, Carolyn (PHMSA)

Andrews  
§173.166  
Air Bags Modules

13-0225

**From:** INFOCNTR (PHMSA)  
**Sent:** Wednesday, November 20, 2013 1:42 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Information about approval for Head Airbag Module  
**Attachments:** Airbag Inflator 1,5-2,1 mol.pdf; Airbag Inflator 2,4 mol.pdf; Airbag Module AU316.pdf; Airbag Module AU416.pdf; pic1.png; pic1.png

Hi Carolyn,

This caller requested we submit this e-mail as a formal letter of interpretation.

Thanks,  
Victoria

**From:** Tröscher Jürgen [mailto:Juergen.Troescher@isi-automotive.com]  
**Sent:** Wednesday, November 20, 2013 9:47 AM  
**To:** Fink, William (PHMSA); INFOCNTR (PHMSA)  
**Subject:** AW: Information about approval for Head Airbag Module

Dear Mr. Fink,

Thank you for your fast reply.

I have a question concerning packaging of Airbag Inflators and Airbag Modules.

Referring to the "Code of Federal Regulations" 49 CF § 173.166 (d) (2) *An air bag module containing an inflator that has been previously approved for transportation is not required to be submitted for further examination or approval* an approval for Airbag Modules is not necessary when the Airbag Inflator is already approved.

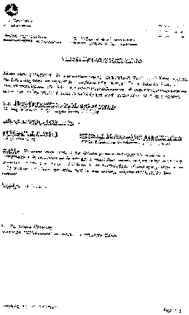
As you can see in the attached file *Airbag Inflator 1,5-2,1 mol* there is instructed a specific packaging requirement (inner packaging and outer packaging). → **Do I also have to use exactly that packaging for Airbag Modules?** If yes, this is in practice not possible because of the difference of volume between Inflator and Module. But in some Classifications of Explosives (as you can see in the attached file: *Airbag Inflator 2,4 mol*) there is the note that all combinations of packaging listed in 49 CFR section 173.166(e) are authorized for Airbag Inflators and Airbag Modules they contain.

Additionally we applied for an Classification of Explosives for Airbag Modules (although an Classification of Explosives is already existing for the Airbag Inflator which is part of the Airbag Module). There is also a difference in information (as you can see in the attached files: *Airbag Module AU316* and *Airbag Module 416*). One of these Classifications notes again that all combinations of packaging according to in 49 CFR section 173.166(e) is allowed. The other classification describes a defined packaging. **When I have an approved Inflator for several types of packaging and an approved Module for just exact this packaging which one is the correct shipping type?** Remember "Code of Federal Regulations" 49 CF § 173.166 (d).

Maybe the following picture is more clear for you regarding to my question:

**Classification of Explosives**

**Airbag inflator**

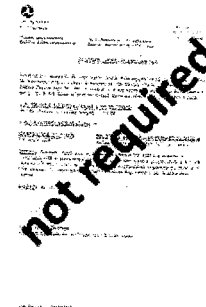


*all types of packaging are allowed*



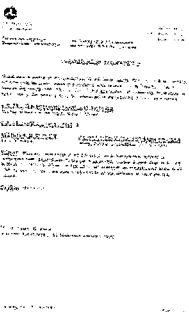
**Classification of Explosives**

**Airbag Module**



**Classification of Explosives**

**Airbag Inflator**

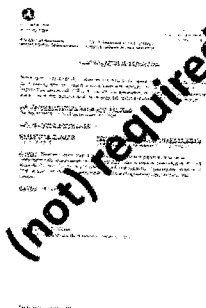


*specific type of packaging*



**Classification of Explosives**

**Airbag Module**



*not required when transportation in exact that type of packaging is possible  
required when another type of packaging is used for transportation*

Thank you in advance for your support regarding to our questions. If you have any questions or is anything not explicitly described please feel free to contact me.

Best regards,

**Jürgen Tröscher M.A.**  
Supply Chain Manager

iSi Automotive Austria GmbH  
Scheydgasse 30-32  
1210 Vienna  
Austria

Tel. +43-1-246 44-299  
Fax. +43-1-246 44-30

[juergen.troescher@isi-automotive.com](mailto:juergen.troescher@isi-automotive.com)  
[www.isi-automotive.com](http://www.isi-automotive.com)

Commercial Court Vienna, FN 254200z, Registered Office Vienna, VAT No ATU 61325603

**Von:** [William.Fink@dot.gov](mailto:William.Fink@dot.gov) [mailto:William.Fink@dot.gov]  
**Gesendet:** Donnerstag, 07. November 2013 13:39  
**An:** Tröscher Jürgen  
**Betreff:** RE: Information about approval for Head Airbag Module

Mr. Jurgen,

The information provided is not sufficient to fully answer your questions.

You have not provided a copy of the approval. After the words, "*This classification is only valid when packaged as follows: ...*"

*What comes after the .... The packaging notes limit the number of units per outer package and will call out specific dunnage and inner and intermediate packaging requirements.*

*Please submit your questions in accordance with CFR49 105.20 see link below-*

<http://www.gpo.gov/fdsys/pkg/CFR-2007-title49-vol2/xml/CFR-2007-title49-vol2-sec105-20.xml>

William R. Fink  
Transportation Specialist  
US DOT PHMSA  
[WILLIAM.FINK@DOT.GOV](mailto:WILLIAM.FINK@DOT.GOV)  
202-366-1108

**From:** Tröscher Jürgen [mailto:[Juergen.Troescher@isi-automotive.com](mailto:Juergen.Troescher@isi-automotive.com)]  
**Sent:** Thursday, November 07, 2013 2:48 AM  
**To:** Fink, William (PHMSA)  
**Cc:** Coleman, Renee (PHMSA)  
**Subject:** AW: Information about approval for Head Airbag Module

Dear Mr. Fink,

Thank you for your fast response. I hope you are the right person to address another question concerning the "Code of Federal Regulations":

iSi Automotive is producer of air bag inflators and air bag modules and we already applied some DOT Classifications of Explosives.

In the last Classification of Explosives for an air bag inflator we got there are specific constraints according to the packaging. There we can find a detailed description of the packaging we have to use: *This classification is only valid when packaged as follows: ...*

On the other hand in the "Code of Federal Regulations" 49 CF § 173.166 (d) (2) *An air bag module containing an inflator that has been previously approved for transportation is not required to be submitted for further examination or approval.*

**We kindly ask you to answer following questions according to above mentioned abstracts:**

- Do we need a specific Classification of Explosives for our air bag modules when the air bag inflator for this modul already has an existing Classification of Explosives? No, not when packaged in accordance with the approval. see 49 CFR 173.166
- Do we need for different packaging different Classification of Explosives (for air bag modules and also for air bag inflators)? The packaging must be as specified in the approval.
- Is another Classification of Explosives for alternative packaging for air bag inflators obligatory when the Classification of Explosives for the air bag inflator is linked with a specific packaging and amount of parts? Yes it is, when the specific packaging requirements are not met.
- Is another Classification of Explosive for air bag modules obligatory when the Classification of Explosives for the air bag inflator is linked with a specific packaging and amount of parts? Only when the mandatory specific packaging instructions cannot be complied with.

Thank you in advance for your support regarding to our questions. If you have any questions or is anything not explicitly described please feel free to contact me.

Kind regards,

**Jürgen Tröscher M.A.**  
Supply Chain Manager

iSi Automotive Austria GmbH  
Scheydgasse 30-32  
1210 Vienna  
Austria

Tel. +43-1-246 44-299  
Fax. +43-1-246 44-30

[juergen.troescher@isi-automotive.com](mailto:juergen.troescher@isi-automotive.com)  
[www.isi-automotive.com](http://www.isi-automotive.com)

Commercial Court Vienna, FN 254200z, Registered Office Vienna, VAT No ATU 61325603

**Von:** [William.Fink@dot.gov](mailto:William.Fink@dot.gov) [<mailto:William.Fink@dot.gov>]  
**Gesendet:** Mittwoch, 06. November 2013 19:23  
**An:** Tröscher Jürgen  
**Cc:** [William.Fink@dot.gov](mailto:William.Fink@dot.gov)  
**Betreff:** RE: Information about approval for Head Airbag Module

Mr. Troesher,

Please note that approvals may require up to 120 days to process.

US DOT Tracking Number 2013080280 is currently with our Tech Group being reviewed.

Application approvals on average have been running 100 to 120 days.

This application is currently at the 90 day mark.

You are correct- An air bag module containing an inflator that has been previously approved for transportation is not required to be submitted for further examination or approval.

Bill Fink

**From:** Coleman, Renee (PHMSA)  
**Sent:** Wednesday, November 06, 2013 11:34 AM  
**To:** Fink, William (PHMSA)  
**Cc:** [Juergen.Troescher@isi-automotive.com](mailto:Juergen.Troescher@isi-automotive.com)  
**Subject:** FW: Information about approval for Head Airbag Module  
**Importance:** High

Fyi

Bill please see below. Thank you.

Renee

*Renee Coleman*

Pipeline and Hazardous  
Materials Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.E. Bldg,  
Room E23-406; Washington, D.C. 20590  
[renee.coleman@dot.gov](mailto:renee.coleman@dot.gov)  
T: 202-366-4511, F: 202-366-3753

**From:** Tröscher Jürgen [<mailto:Juergen.Troescher@isi-automotive.com>]  
**Sent:** Wednesday, November 06, 2013 11:17 AM  
**To:** Coleman, Renee (PHMSA)  
**Subject:** Information about approval for Head Airbag Module  
**Importance:** High

Dear Mrs. Coleman,

I could not reach Mr. Bill Think so I hope you can forward this e-mail to him or to somebody who can help us.

We filled out an application for Approval for Head Airbag Module AU316 and got the Tracking Number 2013080280 on 08-05-2013.

Because of the progress in our project we have the obligation to send products to our customer and therefore it would be necessary to have the DOT-Approval for our packaging material.

There is also another question we have concerning the approval:

We already have an existing DOT-Approval for our Head Airbag inflator but not for the module. At § 173.166 in 49 CFR Ch.1 we found this: An air bag module containing an inflator that has been previously approved for transportation is not required to be submitted for further examination or approval.

On the other hand there is an approval just for a specific packaging and filling degree. It is not possible to send an air bag module with this filling degree in this kind of packaging because of lack of space.

Thank you in advance for your help.

If you have any questions please don't hesitate to contact me.

Best regards,

**Jürgen Tröscher M.A.**  
Supply Chain Manager

iSi Automotive Austria GmbH  
Scheidgasse 30-32  
1210 Vienna  
Austria

Tel. +43-1-246 44-299

Fax. +43-1-246 44-30

[juergen.troescher@isi-automotive.com](mailto:juergen.troescher@isi-automotive.com)

[www.isi-automotive.com](http://www.isi-automotive.com)

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The US Department of Transportation  
Competent Authority for the United States

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1200 New Jersey Avenue, Southeast  
Washington, D.C. 20590

**CLASSIFICATION OF EXPLOSIVES**

Based upon a request by iSi Automotive GmbH, Scheydgasse 30-32, 1210 Wien, Austria, the following items are classed in accordance with Section 173.56, Title 49, Code of Federal Regulations (49 CFR). A copy of your application, all supporting documentation and a copy of this approval must be retained and made available to DOT upon request.

**U.N. PROPER SHIPPING NAME AND NUMBER:**

Air bag modules, UN3268

**U.N. CLASSIFICATION CODE:** 9

**REFERENCE NUMBER**

EX2010080133

**PRODUCT DESIGNATION/PART NUMBER**

Head Airbag Module (BAM 0589-P1-0005)

**NOTES:** All combinations of packagings listed in 49 CFR Section 173.166(e) are authorized.

**DATED:** 10/21/2010

*Harpreet K. Singh*

For Dr. Magdy El-Sibaie  
Associate Administrator for Hazardous Materials Safety



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1200 New Jersey Avenue, Southeast  
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**CLASSIFICATION OF EXPLOSIVES**

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**U.N. PROPER SHIPPING NAME AND NUMBER:**

Air bag inflators, or Air bag modules UN3268

**U.N. CLASSIFICATION CODE:** 9

**REFERENCE NUMBER**

EX2012070341

**PRODUCT DESIGNATION/PART NUMBER**

Headairbag module AU316 (0589-P1-0011)

NOTES: Pressure vessels used in the devices given in this approval must be in compliance with requirements for the gas or gases they contain as prescribed in 49 CFR Sections 173.301, 173.302 or 173.306(a)(1).

This classification is only valid when packaged as follows:

Inner Packaging - Trays, fiberboard, each containing not more than five (5) articles.

Outer Packaging - UN 4G fiberboard box containing not more than four (4) inner packagings.

**DATED:** 11/09/2012

For Dr. Magdy El-Sibaie  
Associate Administrator for Hazardous Materials Safety



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**CLASSIFICATION OF EXPLOSIVES**

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**U.N. PROPER SHIPPING NAME AND NUMBER:**

Air bag inflators, or Air bag modules, UN3268

**U.N. CLASSIFICATION CODE:** 9

**REFERENCE NUMBER**

EX2010050038

**PRODUCT DESIGNATION/PART NUMBER**

Airbag inflator cool inflator CI17 (2.4 mole)

**NOTES:** Pressure vessels used in the devices given in this approval must be in compliance with requirements for the gas or gases they contain as prescribed in 49 CFR Sections 173.301, 173.302 or 173.306(a)(1). All combinations of packagings listed in 49 CFR Section 173.166(e) are authorized for both air bag inflators and modules they contain.

**DATED:** 09/10/2010

*Harpreet K. Singh*

For Dr. Magdy El-Sibaie  
Associate Administrator for Hazardous Materials Safety



U.S. Department  
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East Building, PHH - 32  
1200 New Jersey Avenue, Southeast  
Washington, D.C. 20590

**CLASSIFICATION OF EXPLOSIVES**

Based upon a request by iSi Automotive Austria GmbH, Scheydgasse 30-32, 1210 Wien, Austria the following items are classed in accordance with Section 173.56, Title 49, Code of Federal Regulations (49 CFR). A copy of your application, all supporting documentation and a copy of this approval must be retained and made available to DOT upon request.

**U.N. PROPER SHIPPING NAME AND NUMBER:**

Air bag inflators, or Air bag modules, UN3268

**U.N. CLASSIFICATION CODE:** 9

**REFERENCE NUMBER**

EX2012070340

**PRODUCT DESIGNATION/PART NUMBER**

Cool Inflator Fusion 1.5-2.1 mol (0589-P1-0004)

NOTES: Pressure vessels used in the devices given in this approval must be in compliance with requirements for the gas or gases they contain as prescribed in 49 CFR Sections 173.301, 173.302 or 173.306(a)(1).

This classification is only valid when packaged as follows:  
Inner Packaging - Trays, molded plastic, each containing not more than ten (10) articles.  
Outer Packaging - UN 4A steel box containing not more than fifty-two (52) inner packagings in up to thirteen (13) layers of four (4) each.

**DATED:** 09/28/2012

*Harpreet K. Singh*

For Dr. Magdy El-Sibaie  
Associate Administrator for Hazardous Materials Safety

Tracking No: 2012070464

Page 1 of 1