



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

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

JUN 14 2010

Ms. Jennifer Lucia
Global Logistics Coordinator
Fox Racing
130 Hangar Way
Watsonville, CA 95076

Reference No. 10-0118

Dear Ms. Lucia:

This is in response to your e-mail asking whether certain snowmobile shock absorbers are regulated under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You provided a link to the product and state that the sleeve cover has air with a pressure of 50 to 150 psi, depending upon the application. You also state the extra air chamber on the side helps regulate the damper on the air shock and can potentially go to a maximum of 300 psi under compression, depending how it is adjusted.

Requirements applicable to the shipment of Accumulators intended to function as shock absorbers, struts, gas springs, pneumatic springs or other impact or energy-absorbing devices are prescribed in § 173.306(f) of the HMR. These devices are not subject to the HMR under the conditions specified in § 173.306(f)(4). As provided in § 173.306(f)(5), if the shock absorbers do not meet the applicable criteria, they may not be transported unless approved by the Associate Administrator of Hazardous Materials. The Office of Hazardous Materials Special Permits and Approvals may be contacted at (202) 366-4512.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Mitchell', written over a horizontal line.

Hattie L. Mitchell, Chief
Regulatory Review and Reinvention
Office of Hazardous Materials Standards

Drakeford, Carolyn (PHMSA)

McIntyre
\$171.1
\$172.101

From: INFOCNTR (PHMSA)
Sent: Thursday, February 25, 2010 5:06 PM
To: Drakeford, Carolyn (PHMSA)
Subject: FW: Fox Racing Shox - exporting snowmobile shock into JAPAN - Need DOT approval?

Applicability
10-0118

Importance: High

From: Jennifer Lucia [mailto:jlucia@foxracingshox.com]
Sent: Thursday, February 25, 2010 12:23 PM
To: wilson, leandrew (PHMSA)
Cc: Lima, Anthony (PHMSA)
Subject: Fox Racing Shox - exporting snowmobile shock into JAPAN - Need DOT approval?
Importance: High

Lee,

Thank you for taking the time to speak with me this morning and looking into this further.

Below is a link of what we will be shipping into JAPAN. It is about 18" in length. The only difference between this shock and a vehicle shock is that it replaces the regular coil shock with air. The sleeve cover (black with the FOX decal) has ambient air with a pressure of 50 to 150 psi, depending upon the application. The extra air chamber on the side helps regulate the damper on the air shock and can potentially go to a max of 300 psi, under compression, depending how it is adjusted.

http://www.foxracingshox.com/snowmobile/mountain/FLOAT_R_EVOL

If you could please assist with determining the following, it would be GREATLY appreciated.

- a) Is this DOT regulated? Are snowmobile air shocks DoT regulated?
- b) *If yes*, where is it outlined in the DOT regulations? And what tests do I need to have run to get DOT approval?
- c) *If no*, could you please provide a statement via email so that we can pass it to our customer to appease any concerns they have.

Thank you again for your time.

Sincerely,

Jennifer Lucia
Global Logistics Coordinator
(831) 274-6545 Direct
(831) 768-9342 Fax
jlucia@foxracingshox.com
130 Hangar Way
Watsonville, CA 95076



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