



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

1200 New Jersey Avenue, SE
Washington, DC 20590

MAR 15 2011

Mr. Rod Iverson
Securaplane Technologies, Inc.
10900 N. Stallard Place
Tucson, AZ 85737

Ref. No.: 11-0025

Dear Mr. Iverson:

This responds to your January 31, 2011 email requesting clarification of the requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to design type testing requirements for a lithium ion battery. According to your letter, your company, located in Tucson, AZ contracted with another company based in San Jose, CA to assemble and test a lithium ion battery pack in accordance with the applicable requirements of United Nations (UN) Manual of Tests and Criteria. The battery packs assembled by this company passed the applicable tests. You wish to continue manufacturing this battery pack at your Tucson, AZ facility and you ask us to confirm your understanding that your company may manufacture lithium ion batteries that are identical to the previously manufactured and tested lithium ion batteries without subjecting them to additional testing.

The tests outlined in the UN Manual of Tests and Criteria for lithium batteries are design type tests. Provided the lithium ion batteries you intend to manufacture are identical to a previously tested design type, additional testing is not required.

I hope this answers your inquiry. If you need additional assistance, please contact the Standards and Rulemaking Division.

Sincerely,

A handwritten signature in black ink that reads "Ben Supko".

Ben Supko
Acting Chief, Standards Development Branch
Standards and Rulemaking Division

Leary
§ 173.185
Batteries

11-0025

Drakeford, Carolyn (PHMSA)

From: INFOCNTR (PHMSA)
Sent: Monday, January 31, 2011 2:23 PM
To: Drakeford, Carolyn (PHMSA)
Subject: Interp Letter Request FW: Li battery UN test report applicability

From: Rod Iverson [<mailto:riverson@securaplane.com>]
Sent: Monday, January 31, 2011 10:28 AM
To: INFOCNTR (PHMSA)
Subject: Li battery UN test report applicability

Company Introduction: Securaplane Technologies, Inc. is a Tucson, AZ based Engineering and Manufacturing company. Battery design and manufacturing for the Commercial and General Aviation market is approximately 25% of our business.

Subject: Securaplane designed and produced a 7.4 volt, 3.3Amp Hour Li Ion Polymer Battery pack for the Boeing 787 airplane. The LI-Ion-Polymer battery pack has been subjected to and passed all required FAA and Boeing environmental test requirements.

Securaplane released a build to print production contract to Rose Electronics 2030 Ringwood Ave San Jose, CA 95131 for the assembly and test of the Securaplane battery pack design. The production quantities of the li-Ion battery contract required that the units meet the UN test requirements for transportation of the packs. Securaplane working with Rose Electronics issued a contract to Mobile Power Solutions, Beaverton, OR for the UN Transportation test activity. The Units passed and test report number R1-695 was issued along with Certificate of Compliance for the Battery packs. The packs are identified with Securaplane part number 100-2602-01 using Kokam SLPB-526495 cells. Rose Electronics completed assemblies are all shipped to Securaplane for a final test prior to delivery to our customer.

Securaplane plans to return the manufacturing of the Li Ion Battery to our facility in Tucson, AZ in February 2011. The Rose Electronics manufactured battery used for the UN test is identical to the product to be manufactured by Securaplane. Hence, the UN test results and Certificate of Compliance are considered directly applicable to the Securaplane Li Ion Battery product. Securaplane respectfully requests your concurrence with this assessment regarding the UN test and Certificate of compliance.

The request: Please provide a formal letter of interpretation regarding this transfer/application of the June 2010 UN test results and Certificate of Compliance for the Securaplane manufactured Li Ion Battery.

Rod Iverson
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