



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

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

AUG 22 2006

Mr. Brion Munsey
Western Regional Sales Manager
House of Batteries
10910 Talbert Avenue
Fountain Valley, CA 92708

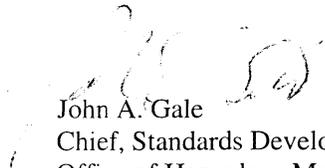
Ref. No. 06-0079

Dear Mr. Munsey:

This is in response to your letter and subsequent conversation with Mr. Darral Reierford concerning the requirements in the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) for excepted shipments of primary lithium cells and batteries. Specifically, you ask whether your primary lithium cells assembled into three-cell stacks, which you refer to as "CR2032 primary lithium coin cells" with a lithium content of 0.062g of lithium metal, are subject to the requirements in the UN Manual of Tests and Criteria for lithium batteries. According to your letter the cells, which individually conform to the UN testing requirements, are stacked one on top of the other and held together by PVC heat shrink tubing and the cells are not permanently connected together.

Based on the diagram and information provided, it appears that the "three cell stack configuration" of your "CR2032 primary lithium coin cells" containing 0.062g of lithium metal that are in direct contact with one another meets the definition for a "battery" as described by the UN and applicable to the lithium battery provisions in § 173.185 of the HMR. In the United Nation's Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria, Fourth Revised Edition the word "battery" means one or more cells that are electrically connected together by a "permanent means," including case, terminals, and markings. I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

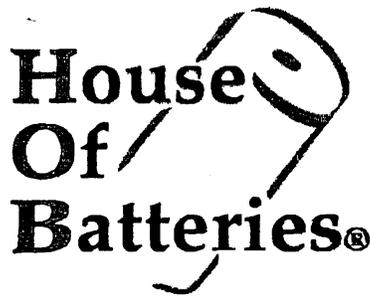
Sincerely,


John A. Gale
Chief, Standards Development
Office of Hazardous Materials Standards



060079

173.185



Relentford
8173-185
Lithium Batteries
06-0079

10910 Talbert Avenue, Fountain Valley, CA 92708
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Batteries and Assemblies for Every Electronic Application

March 30, 2005

Mr. Edward Mazzullo
Director of Hazardous Materials Standards
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
400 7th Street, SW
Washington, DC 20590

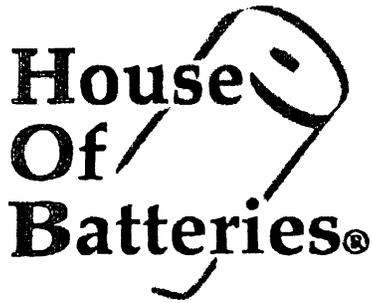
Re: UN Testing Requirement for Lithium Batteries

Dear Mr. Mazzullo:

I am writing to confirm our understanding of the UN lithium battery testing requirements as they apply to one of our products.

House of Batteries is a small business, less than 100 employees, and we assemble a variety of single and multi-cell lithium, lithium ion, and lithium polymer battery packs. One of our customers has requested that we provide them with a three-cell stacked configuration of CR2032 lithium primary coin cells. The CR2032 cell used in this configuration is compliant with the UN testing requirements, and each cell has only 0.062g of lithium metal. CR2032 cells also have a solid cathode not liquid.

The cells will be stacked one on top of the other and held together by PVC heat shrink tubing. The cells are not permanently welded together. The cells in this configuration will be shipped domestically as well as internationally.



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Our understanding of the lithium battery testing requirements for lithium cells and batteries leads us to believe that this cell configuration does not require UN testing. The three-cell configuration does not meet the definition of a "battery" ("*one or more cells which are electrically connected together by permanent means, including case, terminals, and markings*") because the cells are not permanently connected together but simply placed inside a PVC sleeve to facilitate shipping and ease of installation. The final user has the option of utilizing the cells individually in various applications.

Therefore, based on the information we have provided, please confirm that the three-cell configuration is not subject to the UN testing requirements for lithium batteries.

Thank you for your assistance.

Regards,

A handwritten signature in black ink, appearing to read "Brion Munsey". The signature is written in a cursive, somewhat stylized font.

Brion Munsey
Western Regional Sales Manager