



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

1200 New Jersey Avenue, SE  
Washington, DC 20590

Carol Vierling  
Acting Regulatory Affairs Manager  
Invacare Corporation  
One Invacare Way  
P.O. Box 4028  
Elyria, OH 44036

FEB 20 2015

Ref. No. 15-0002

Dear Ms. Vierling:

This responds to your December 30, 2014 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to a portable oxygen concentrator (POC). Specifically, you inquire about obtaining approval from the Pipeline and Hazardous Materials Safety Administration (PHMSA) and the Federal Aviation Administration (FAA) to allow a passenger to carry and operate the POC on board an aircraft.

According to your letter, the POC (trade name Invacare XPO<sub>2</sub>) is a device for use by patients requiring high concentrations of oxygen on a supplemental basis. The device in question is a modified version of an earlier model of the Invacare XPO<sub>2</sub> POC that is currently listed in Special Federal Aviation Regulation 106, "*Rules for Use of Portable Oxygen Concentrator Systems on Board Aircraft*" (SFAR 106) and approved for use on board aircraft. The modified version of the Invacare XPO<sub>2</sub> POC for which you seek approval has a maximum operating pressure of less than 21.0 pounds per square inch (psia). It is powered by multiple sources, including AC or DC power, a captive internal lithium ion battery pack, and a rechargeable external accessory lithium ion battery pack. Both the captive internal lithium ion battery pack and the rechargeable external accessory lithium ion battery pack have a Watt-hour (Wh) rating of 83.5 (2.9 ampere-hour (Ah) x 3.6 volts (V) x 8 cells). Both the captive internal and the rechargeable external accessory lithium ion battery packs meet the appropriate testing requirements of the United Nations Manual of Tests and Criteria, and both battery packs are packaged in a manner to prevent short circuits. You ask whether the modified version of the Invacare XPO<sub>2</sub> POC is authorized under the HMR to be carried on board an aircraft.

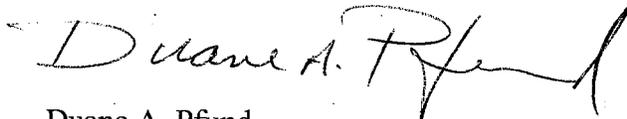
Based on the information provided in your letter, the modified version of the Invacare XPO<sub>2</sub> POC is not subject to the HMR as a Division 2.2 non-flammable gas, the captive internal and the rechargeable external accessory lithium ion battery packs used to power the device

conform to § 175.10(a)(18), and the POC contains no other hazardous materials. Therefore, in accordance with HMR § 175.10(a)(18), the modified version of the Invacare XPO<sub>2</sub> POC is authorized to be carried on board an aircraft by passengers or crew members.

Please note that notwithstanding the passenger exception in § 175.10(a)(18) of the HMR, the provisions of SFAR 106 apply and are under the purview of the FAA. This response satisfies only one requirement in the FAA approval process before a POC may be carried and operated on board an aircraft. You may contact Ms. DK Deaderick in FAA's Flight Standards Service at (202) 267-7480 for questions regarding FAA's approval process.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Duane A. Pfund". The signature is written in a cursive style with a large, stylized initial "D".

Duane A. Pfund  
International Standards Coordinator  
Standards and Rulemaking Division



**Yes, you can.**

DOT/RSFA/OHMS  
UNIT

15 JAN -6 PM 3: 30

December 30, 2014

U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
Office of Hazardous Materials and Standards  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590-0001

Dear Sir or Madam,

Invacare Corp. is requesting confirmation from the Pipeline and Hazardous Materials Safety Administration (PHMSA) that the Invacare® XPO<sub>2</sub><sup>TM</sup> Portable Oxygen Concentrator (XPO2 POC) is not subject to the U.S. Hazardous Materials Regulation (HMR) under HMR 49 CFR Parts 100-180 after review of all appropriate information.

#### Introduction

Invacare Corp. manufactures portable oxygen concentrators (POCs) and has marketed the XPO2 POC since receiving 510(k) clearance from the Food and Drug Administration (FDA) on December 12, 2007. The XPO2 POC is currently allowed to be used onboard aircraft and was added to SFAR No. 106 published in the Federal Register on January 15, 2009. As part of that application, Mr. Mazzullo of the U.S. Department of Transportation sent a letter to Invacare Corp. stating that the Invacare® XPO<sub>2</sub><sup>TM</sup> Portable Oxygen Concentrator is not subject to the HMR. Please refer to Attachment 1 for the Federal Register Notice.

The XPO2 POC continues to provide oxygen by separating oxygen from room air utilizing a molecular sieve and pressure swing adsorption methodology. The resultant concentrated oxygen is directed toward an oxygen reservoir for delivery to the patient. The XPO2 device delivers the oxygen to the patient through the pulse delivery method for maximum effectiveness and operational time. This means that the subject devices deliver oxygen only when a breath is detected. If no breath is detected (i.e. the cannula detaches from the device or the patient takes the cannula off), no oxygen is delivered. This feature of delivering oxygen only when a breath is detected prevents oxygen saturation of the surrounding area or materials when the cannula is not connected to the concentrator or the patient. The technological characteristics of the modified XPO2 POC remains the same as the original XPO<sub>2</sub> Portable Oxygen Concentrator listed under SFAR No. 106. Please refer to Attachment 2 for the finished device drawing.

#### INVACARE CORPORATION

One Invacare Way P.O. Box 4028 Elyria, Ohio 44036-2125 USA



**Yes, you can.®**

### Proposed Modifications

Invacare Corporation has modified the internal and external batteries of the XPO2 device to improve use duration and to increase the expected life cycle. In addition, some minor design changes have also been incorporated for quality improvement purposes only.

### Power Source for the Invacare XPO2 POC

The subject device can be powered by an internally captive lithium ion battery pack that is not customer removable or replaceable, an external AC to DC power adapter, an external DC to DC power adapter, or an external accessory lithium ion battery pack. This allows for maximum flexibility and operational time with multiple power sources. Recharging of either the internal or external accessory batteries is only available with the use of the Invacare supplied AC/DC or DC/DC power adapters.

The internally captive lithium ion battery pack (see Attachment 3) consists of 8 cylindrical 2.9 amp-hour lithium ion cells with a total lithium equivalent content of 6.36 grams of lithium, and watt hour rating of 85.3 Whr (see Attachment 4). The internally captive battery pack is not user accessible and not replaceable by a patient/user. The internally captive mechanism of the subject devices also prevents any user from generating sparks or short-circuiting as it is not externally accessible. The battery pack terminals are not exposed to any outside contact by virtue of being totally integrated into the product.

The external accessory battery module for extended operating time is a self-contained power accessory for the XPO2 device. The external battery module contains a separate lithium battery pack that consists of 8 cylindrical 2.9 amp-hour lithium ion cells with a total lithium equivalent content of 6.36 grams of lithium, and watt hour rating of 85.3 Whr. The lithium battery pack is not user accessible and is not replaceable by a patient/user. The captive mounting mechanism of the external battery module also prevents any user from generating sparks or short-circuiting the lithium battery pack. The battery pack terminals are not exposed to any outside contact as they are connected to an intervening power switching and charging circuit board that interfaces to the Invacare XPO2 device. The external battery module connection cable contains a connector that prevents accidental shorting or generation of sparks during handling or storage. Please refer to Attachment 5 for the external battery module, external battery pack, circuit board schematic and external battery module connection cable.

The table below compares the XPO2 POC currently marketed with PHMSA approval in 2008 and the evaluation results of the proposed modification

PHMSA Special Provision 188 Comparison Table

Invacare XPO2 Portable Oxygen Concentrator

Item	PHMSA Criteria	PHMSA 2008 Approval		2014 Submittal		Comments
		Value	Result	Value	Result	
1	Pressure of the oxygen in the device does not exceed 40.6 PSIA at 20C	< 21 PSIA	Pass	< 21 PSIA	Pass	No change
2	Lithium cells do not contain more than 1.5 grams of lithium equivalent content	2.6 AH Cell 0.78 L.E.gram	Pass	2.9 AH Cell 0.87 L.E.gram	Pass	Slight increase in lithium content
3	Lithium batteries contain an aggregate equivalent lithium content of not more than 8g	8 cells/battery 6.24 L. E. grams	Pass	8 cells 6.96 L. E. grams	Pass	Slight increase in lithium content
4	The device contains no other materisl subject to the HMR	No other hazardous materials	Pass	No other hazardous materials	Pass	No change
5	The batteries are fully contained in equipment and packaged in a manner to preclude sparks or the generation of a dangerous quantity of heat	Fully contained inside of protective product enclosure	Pass	Fully contained inside of protective product enclosure	Pass	No change

L.E. gram = Lithium equivalent grams content



**Yes, you can.**

Compliance with RTCA/DO-160G

The Invacare XPO2 POC has successfully undergone testing pursuant to the requirements of RTCA/DO-160G, Section 21, Category M to demonstrate that the device will not interfere with an aircraft's electrical, navigation or communication equipment. A summary of the test report is provided in Attachment 6.

Conclusion

In conclusion, the updated XPO2 device continues to meet the five PHMSA Special Provision 188 criteria. In addition, data show acceptable RTCA DP-160 test results. Based on this information, Invacare Corp. asks that the PHMSA confirm that the Invacare XPO2 device is not subject to the U.S. Hazardous Materials Regulation under HMR 49 CFR Parts 100-180.

Invacare has discussed the minor modifications to the XPO2 with the Federal Aviation Administration (FAA) and submitted the proposed changes with supporting documents to the agency. Prior to their approval, the FAA has requested that Invacare Corp. obtain a letter from the PHMSA stating that the XPO2 does not contain hazardous materials.

We would appreciate your timely response. A letter from the PHMSA is all that is needed for FAA approval. If you have any questions, please contact me by telephone at 706-476-2938 or by email at [carol.vierling@yahoo.com](mailto:carol.vierling@yahoo.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Carol Vierling", written over a horizontal line.

Carol Vierling  
Acting RA Manager

more about SBREFA on the Internet at our site, [http://www.faa.gov/regulations\\_policies/rulemaking/sbre\\_act/](http://www.faa.gov/regulations_policies/rulemaking/sbre_act/).

#### Authority for This Rulemaking

The FAA's authority to issue rules regarding aviation safety is found in Title 49 of the United States Code (49 U.S.C.). Subtitle I, Section 106 describes the authority of the FAA Administrator. Subtitle VII, Aviation Programs, describes in more detail the scope of the agency's authority.

The FAA is authorized to issue this final rule pursuant to 49 U.S.C. 44701. Under that section, the FAA is authorized to establish regulations and minimum standards for other practices, methods, and procedures the Administrator finds necessary for air commerce and national security.

#### Background

On July 12, 2005, the FAA published Special Federal Aviation Regulation 106 (SFAR 106) entitled, "Use of Certain Portable Oxygen Concentrator Devices On Board Aircraft" (70 FR 40156). SFAR 106 is the result of a notice of proposed rulemaking (NPRM) the FAA published in July 2004 (69 FR 42324) to address the needs of passengers who must travel with medical oxygen. Prior to publication of SFAR 106, passengers in need of medical oxygen during air transportation faced many obstacles when requesting service. Many aircraft operators did not provide medical oxygen service aboard flights, and those that did often provided service at a price that travelers could not afford. Coordinating service between operators and suppliers at airports was also difficult, and passengers frequently chose not to fly because of these difficulties.

New medical oxygen technologies approved by the Food and Drug Administration (FDA) reduce the risks typically associated with compressed oxygen and provide a safe alternative for passengers who need oxygen therapy. Several manufacturers have developed small portable oxygen concentrator (POC) devices that work by separating oxygen from nitrogen and other gases contained in ambient air and dispensing it in concentrated form to the user with an oxygen concentration of about 90%. The POC devices operate using either rechargeable batteries or, if the aircraft operator obtains approval from the FAA, aircraft electrical power.

In addition, the Pipeline and Hazardous Materials Safety Administration (PHMSA) has determined that the POC devices covered by this amendment are not

hazardous materials. Thus, they do not require the same level of special handling as compressed oxygen, and are safe for use on board aircraft, provided certain conditions for their use are met.

SFAR 106 permits passengers to carry on and use certain POC devices on board aircraft if the aircraft operator ensures that the conditions specified in the SFAR for their use are met. The devices initially determined acceptable for use in SFAR 106, published July 12, 2005, were the *AirSep Corporation's LifeStyle* and the *Inogen, Inc.'s Inogen One* POCs. SFAR 106 was amended on September 12, 2006 (71 FR 53954) to add three additional POC devices, *AirSep Corporation's FreeStyle*, *SeQual Technologies' Eclipse*, and *Repironics Inc.'s EverGo*, to the original SFAR. This final rule adds two additional POC devices, *Delphi Medical Systems' RS-00400* and *Invacare Corporation's XPO2*, that may be carried on and used by a passenger on board an aircraft.

Aircraft operators can now offer medical oxygen service as they did before SFAR 106 was enacted, or they can meet certain conditions and allow passengers to carry on and use one of the POC devices covered in SFAR 106. SFAR 106 is an enabling rule, which means that no aircraft operator is required to allow passengers to operate these POC devices on board its aircraft, but it may allow them to be operated on board. If the aircraft operator allows one of these devices to be carried on board, the conditions in the SFAR must be met.

When SFAR 106 was originally published, the FAA committed to establishing a single standard for all POC devices so that regulations would not apply to specific manufacturers and models of devices. Whenever possible, the FAA tries to regulate by creating performance-based standards rather than approving specific devices by manufacturer. In the case of SFAR 106, the quickest and easiest way to serve both the passenger and the aircraft operator was to allow the use of the devices determined to be acceptable by the FAA in SFAR 106 in a special, temporary regulation. As we stated in the preamble discussion of the final rule that established SFAR 106, "while we are committed to developing a performance-based standard for all future POC devices, we do not want to prematurely develop standards that have the effect of stifling new technology of which we are unaware." We developed and published SFAR 106 so that passengers who otherwise could not fly could do so with an affordable alternative to what existed before SFAR 106 was published.

We continue to pursue the performance-based standard for all POC devices. This process is time-consuming and we intend to publish a notice in the **Federal Register** and offer the public a chance to comment on the proposal when it is complete. In the meantime, manufacturers continue to create new and better POC devices, and several have requested that their product also be included as an acceptable device in SFAR 106. These new manufacturers include Delphi Medical Systems and Invacare Corporation. Each of these companies has formally petitioned the FAA for inclusion in SFAR 106 by submitting documentation of the devices to the Federal Docket Management System. That documentation is available at <http://www.regulations.gov> under the following docket numbers:

1. Delphi Medical Systems—FAA—2008—0261; and
2. Invacare Corporation—FAA—2008—0278.

As stated in Section 2 of SFAR 106, no covered device may contain hazardous materials as determined by PHMSA (written documentation necessary), and each device must also be regulated by the FDA. Each petitioner included technical specifications for the devices in their request for approval, along with the required documentation from PHMSA and the FDA. The petitioners provided the FAA with the required documentation for the following POC devices:

1. Delphi Medical Systems', Model RS-00400; and
2. Invacare Corporation's, Model XPO2.

#### The Rule

This amendment to SFAR 106 will include the *Delphi Medical Systems' RS-00400* and *Invacare Corporation's XPO2* devices in the list of POC devices authorized for use in air commerce. The FAA has reviewed each individual device and accepted the documentation provided by the two manufacturers. That documentation includes letters provided to the manufacturer by PHMSA and the FDA affirming the status of each device as it pertains to the requisites stated in SFAR 106.

After reviewing the applicable FDA safety standards and the PHMSA findings, these two devices were determined by the FAA to be acceptable for use in air commerce.

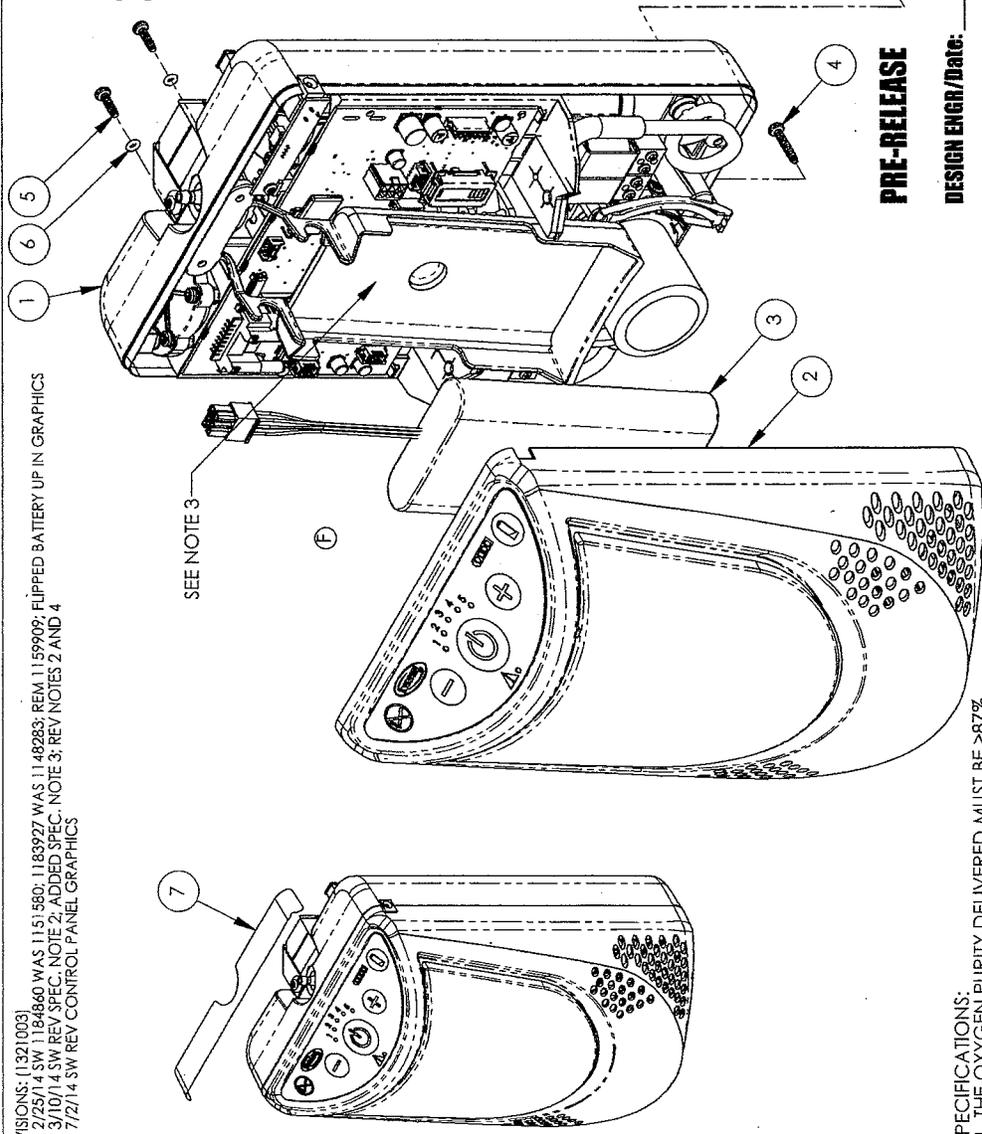
#### Good Cause for Adoption of This Final Rule Without Notice and Comment

As stated above, SFAR 106 was published on July 12, 2005. We stated in the preamble of that final rule that

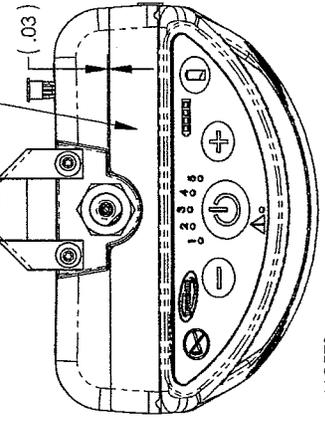
REVISONS: (1321003)  
 00. 2/25/14 SW 1164660 WAS 1151580; 1183927 WAS 1146283; REM 1159909; FLIPPED BATTERY UP IN GRAPHICS  
 01. 3/10/14 SW REV SPEC, NOTE 2; ADDED SPEC, NOTE 3; REV NOTES 2 AND 4  
 02. 7/27/14 SW REV CONTROL PANEL GRAPHICS

ITEM NO.	PART NO.	DESCRIPTION	QTY.
1	1151575	ASM. REAR XPO2	1
2	1184860	ASM. FRONT XPO2	1
3	1183927	ASM. BATTERY PACK INTERNAL XPO2	1
4	1151831	SCREW, 6-19 X .75 TORX PAN HD PLASTITE	2
5	1151560	SCREW, 6-19 X .50 TORX PAN HD PLASTITE	2
6	1148328	O-RING, .114 ID X .070	2
7	1151839	SEAL/NOTICE, XPO2	1
8	1147000	FERRITE, SNAPON	1

\* NOT SHOWN



SEAL/NOTICE TO BE APPLIED TO ASSEMBLED UNIT, POSITIONED AS SHOWN. SEE NOTE 2.



- NOTES:
1. TORQUE SCREWS (ITEMS 4 & 5) TO 3 IN-LBS.
  2. PRIOR TO APPLYING SEAL (ITEM 7) CLEAN SURFACES TO WHICH SEAL WILL ADHERE THOROUGHLY WITH ALCOHOL WIPES!
  3. REMOVE PROTECTIVE COVER/FILM PRIOR TO INSTALLING BATTERY.
  4. INSTALL FERRITE (ITEM 8) ON RED AND BLACK WIRE OF BATTERY (ITEM 3).

△ = CRITICAL QUALITY ATTRIBUTE  
 ▲ = KEY CHARACTERISTIC IDENTIFICATION

THIS IS THE PROPERTY OF INVACARE CORPORATION. IT MUST NOT BE TRADED OR REPRODUCED IN ANY MANNER WITHOUT THE WRITTEN PERMISSION OF INVACARE. IT SHALL BE USED ONLY AS A MEANS OF REFERENCE TO DO WORK DESIGNED OR FURNISHED BY US. DO NOT SCALE THE DRAWING.

DESIGN ENGR /Date: \_\_\_\_\_  
 MFG/SQ ENGR /Date: \_\_\_\_\_  
 QUALITY /Date: \_\_\_\_\_

**PRE-RELEASE**

SPECIFICATIONS:

1. THE OXYGEN PURITY DELIVERED MUST BE ≥87%.
2. OXYGEN WETTED SURFACES ARE TO BE BIOCOMPATIBLE.
3. THE OXYGEN GAS MUST MEET THE REQUIREMENTS OF USP 93 EXCEPT FOR THE OXYGEN PERCENTAGE REQUIREMENT BEING GREATER THAN OR EQUAL TO 87%.
4. THE XPO2 MUST BE FREE OF LEAKS IN OXYGEN WETTED PATHWAY.

REV	DATE	BY	CHK	ENG.	REVISION
F	XX/XX/XX				
E	3/14/14				
D	10/7/11				
C	01/27/11				
B					

DATE: 11/16/07  
 DRAWN BY: HODOS  
 SCALE: 1:2  
 AMATERIAL DESCRIPTION: ASM. CONCENTRATOR XPO2  
 MATERIAL NO.: \_\_\_\_\_  
 PART DESCRIPTION: ASM. CONCENTRATOR XPO2  
 DRAWING SITE: \_\_\_\_\_  
 INVACARE CORP. ELYRIA OHIO  
 PART NO. 1148300

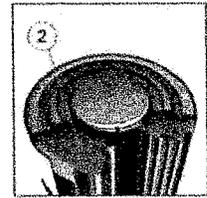
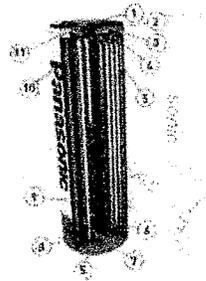


**LITHIUM-ION / NNP + HRL TECHNOLOGY**

Panasonic is one of the leading Lithium-ion battery manufacturers in the world. A perfect combination of high energy density, safety and long life shows what is possible with this battery technology. A continuous co-development with electrical companies all over the world has led to outstandingly good results. Panasonic especially focuses on enhancing safety technologies such as PSS and HRL in order to always guarantee people's safety. On the top of this we have invented our so called NNP technology which gives us the possibility to achieve eminently high battery capacities. Excellent battery safety on one hand, and superior battery performance on the other: this is what Panasonic stands for.

**LI-ION • 3D ILLUSTRATION**

- |   |                                   |
|---|-----------------------------------|
| 1 Positive pole                                 | 6 Cathode                         |
| 2 PTC (positive temperature coefficient device) | 7 Anode                           |
| 3 Gasket  | 8 Negative pole (cell can)        |
| 4 Collector                                     | 9 Separator                       |
| 5 Insulator                                     | 10 CID (current interrupt device) |
|   | 11 Exhaust gas hole               |



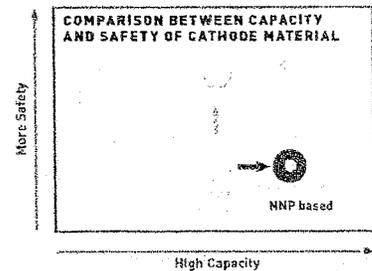
**NNP TECHNOLOGY**

Li-ion battery cells have become indispensable as a power source for cordless equipment, such as laptops, that supports a ubiquitous society. As cordless devices become more sophisticated and powerful, they require more robust battery cells. Panasonic has responded to these challenges with the new battery cells, employing its unique high capacity nickel based positive electrode technology as well as its material and processing technology which prevents deformation of the alloy-based negative electrode when subjected to repeated charge and discharge. This new battery technology is called Nickel Oxide based New Platform.\*1

**Characteristics of the new Panasonic**

**NNP Technology:**

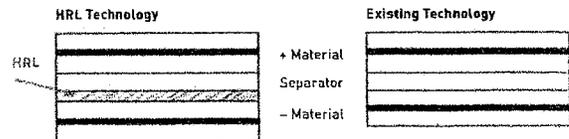
- Superior cycle life performance
- High energy density contributes to downsizing and weight reduction
- The new nickel positive electrode exceeds regarding durability in actual use and charge retention
- Excellent shelf-life due to low self-discharge performance



**HRL TECHNOLOGY**

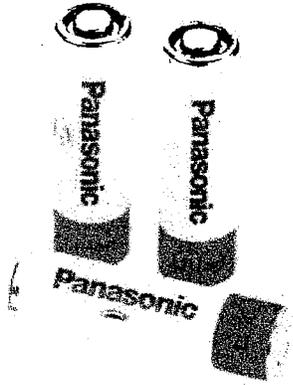
As a power source for mobile and digital equipment essential for a ubiquitous networking society, demand for Lithium-ion batteries has grown fast. As such equipment including notebook PCs, mobile phones, medical equipment and power-tools become more powerful, sophisticated and feature-laden, they require more robust and safer batteries. Increasing energy-density, however, raises the risk of overheating and igniting due to short-circuiting. Panasonic employs the HRL (Heat Resistance Layer) Technology to improve the safety of Lithium-ion batteries significantly. This heat resistance layer consists of an insulating metal oxide on the surface of the electrodes which leads the battery not to overheat even if a short-circuit occurs.

**Safety is the base for everything. Higher Energy can be established based on safety technology.**





# LITHIUM ION



## Features & Benefits

- High energy density and voltage
- Long stable power with flat discharge voltage
- Ideal for portable communications, portable computing and robotics

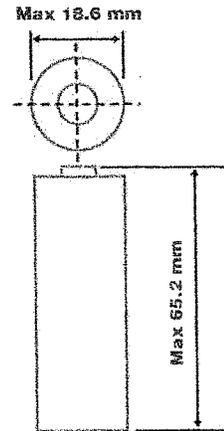
## Specifications

**Capacity:** 2.9Ah Typical  
 (Charge: CVCC, 4.2V, max. 1925mA, 50mA cutoff, 25°C)  
 (Discharge: CC, 550mA, 2.5V cutoff, 25°C)

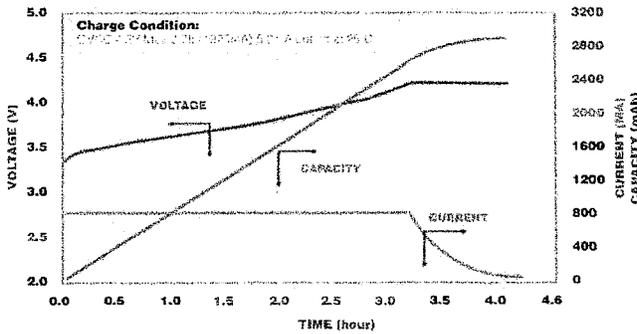
**Nominal Voltage:** 3.6V

**Weight:** Approximately 44.5g

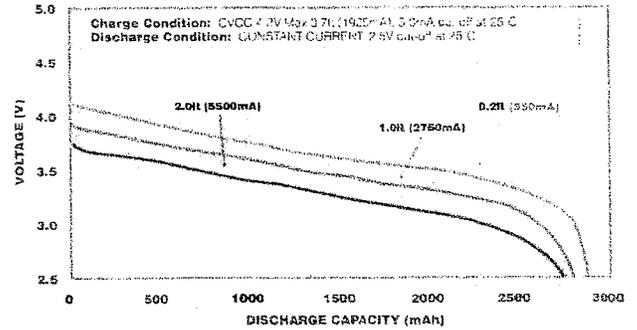
## Dimensions



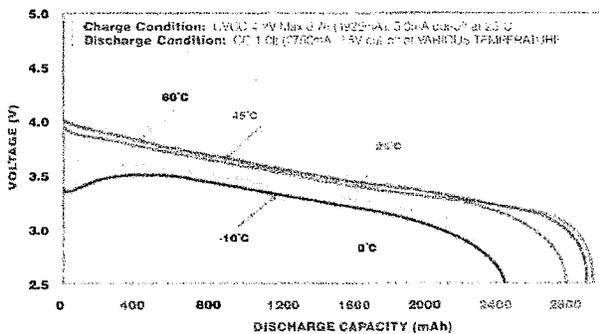
## Charge Characteristics



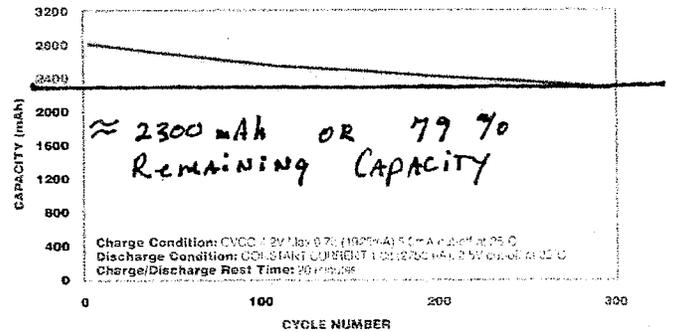
## Discharge Characteristics



## Discharge Characteristics



## Cycle Life Characteristics (25°C)



The data in this document is for descriptive purposes only and is not intended to make or imply any guarantee or warranty.

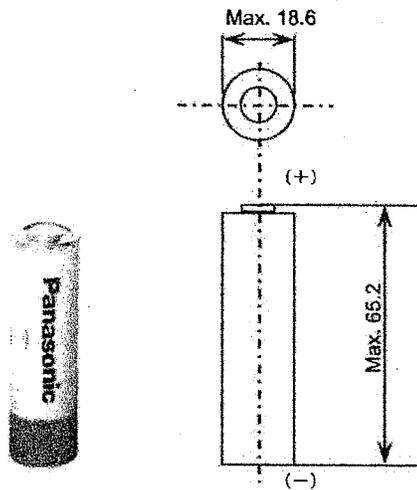


For more information on how Panasonic can assist you with your battery power solution needs call 877-726-2228, visit [www.panasonic.com/industrial/batteries-oom](http://www.panasonic.com/industrial/batteries-oom) or e-mail [oembatteries@us.panasonic.com](mailto:oembatteries@us.panasonic.com)

# NCR-18650

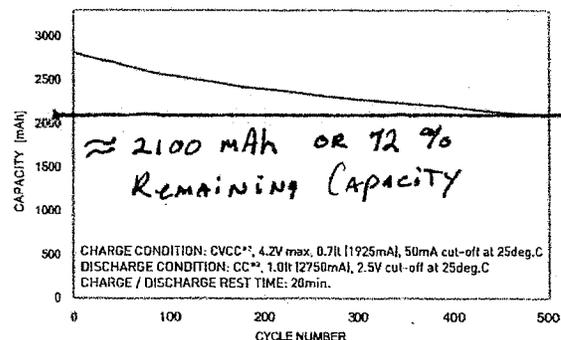
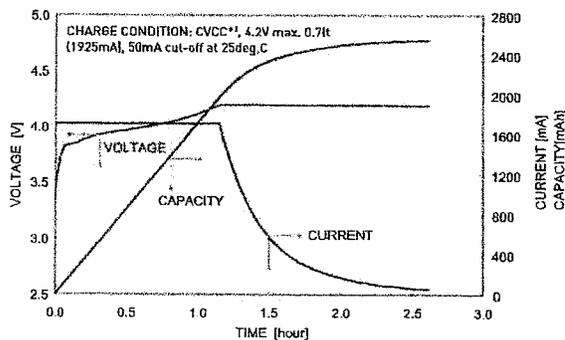
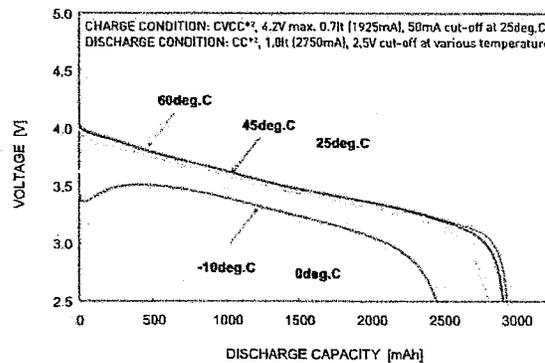
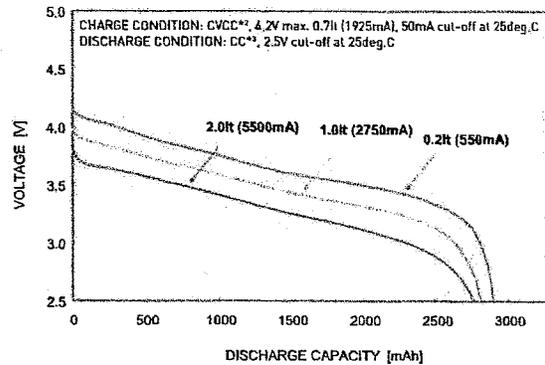
## LITHIUM-ION / NNP + HRL TECHNOLOGY

EXTERIOR VIEW



### SPECIFICATIONS

Model Number	NCR-18650
Nominal voltage (V)	3.6
Nominal capacity*1 - Minimum (mAh)	2,750
Nominal capacity*1 - Typical (mAh)	2,900
Dimensions - Diameter (mm)	max. 18.6
Dimensions - Height (mm)	max. 65.2
Approx. Weight (g)	45



### ⚠ Notice to Readers

We are unable to support single cell business or accept orders from consumers. We design Lithium-Ion battery packs including a suitable safety unit device based on the technical specification of the customer. Due to the need for careful review when selecting Lithium-Ion battery solutions please contact your local Panasonic Sales Office. In order to avoid a lack of supply please check the battery availability with your Panasonic sales team before design-in.

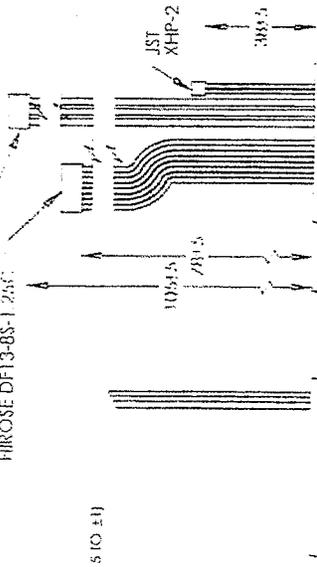
# Panasonic

Panasonic Industrial Europe GmbH | Winsbergring 15 | 22525 Hamburg | Website: <http://industrial.panasonic.com/eu>



1184130

HIROSE DF3-5S-2C  
HIROSE DF3-8S-1 25C



Label Requirements  
Label to be of Polypropylene material and marked with permanent text and graphics with tamper resistant adhesive backing.

- Label dimensions 4.31" x 1.63"
- Label material to be as close as a minimum:
- Label graphics and markings:
- Label graphics "tamper resistant" or accompanied by electrical specs and warning graphics.
- Cell Manufacturer logo P/H
- Name and location of assembler
- WEEE ANSE XIV symbol
- Serial number formatted MMY:XXXX
- o XXXXX = month / year of assembly
- o XXXXX = sequential assembly starting at 00001 beginning each month
- The phrase "Lithium Ion Battery" bolded
- The phrases:
  - o Do Not Incinerate
  - o Do Not Disassemble
  - o Do Not Short Terminals
  - o Do Not Expose to High Temperatures (140F / 60C)
- Warning symbol
- Current Software Revision

Cell Protection:  
Over charge protection from 4.3 V / 0.05V  
Under voltage protection from 2.7 V / 0.05V  
Low temperature protection from 0.0 V / 0.05V  
High temperature protection from 6.6 AMPS (1 sec and 1 day)  
High current protection from 2.5 AMPS (10 sec and 1 day)  
High current protection from 2.5 AMPS (10 sec and 1 day)

TABLE 1: ELECTRICAL CHARACTERISTICS

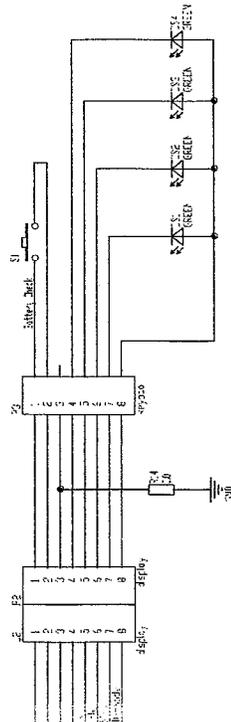
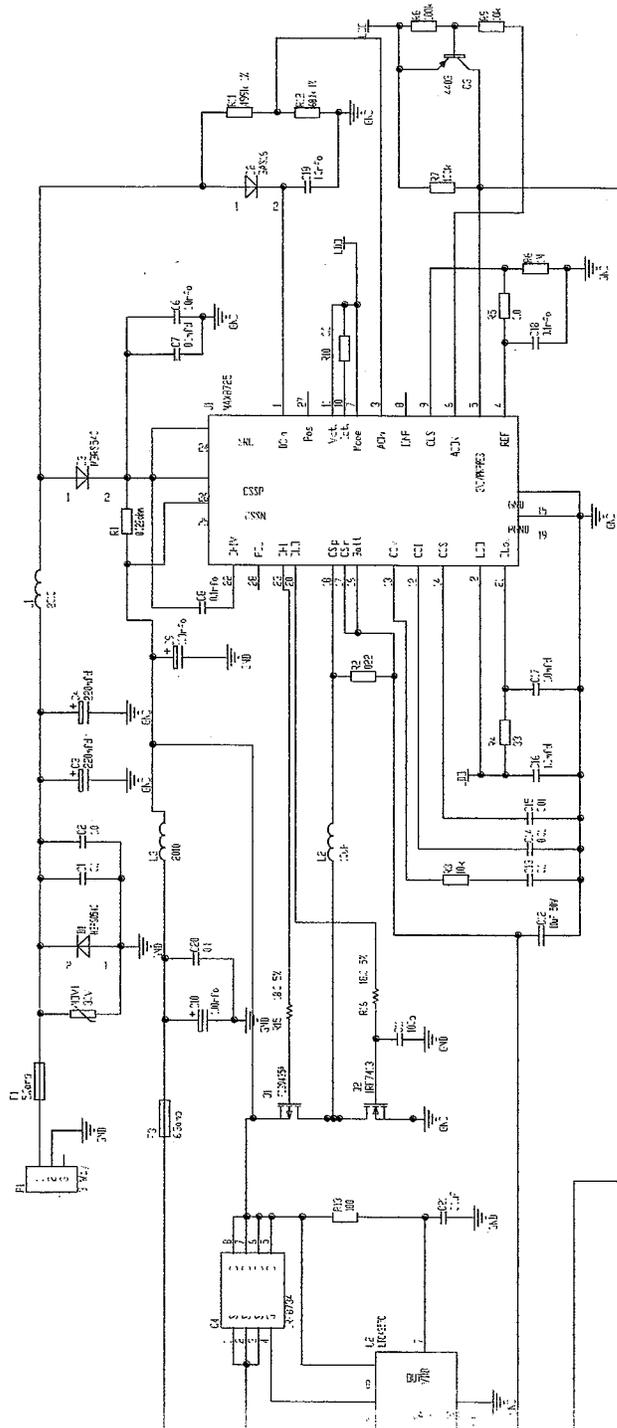
Parameter	Symbol	Value	Unit
Rated Voltage	V <sub>N</sub>	3.7	V
Rated Capacity	C <sub>N</sub>	1050	mAh
Rated Discharge Current	I <sub>D</sub>	0.2	A
Rated Charge Current	I <sub>C</sub>	0.2	A
Operating Temperature Range	T <sub>OP</sub>	-20 to 60	°C
Storage Temperature Range	T <sub>STG</sub>	-30 to 70	°C
Self-Discharge Rate	I <sub>SD</sub>	3	%/month
Internal Impedance	Z <sub>INT</sub>	100	mΩ
Short-Circuit Current	I <sub>SC</sub>	1.0	A
Max. Charge Voltage	V <sub>CHG</sub>	4.2	V
Max. Discharge Voltage	V <sub>DIS</sub>	3.0	V
Max. Charge Current	I <sub>CHG</sub>	0.2	A
Max. Discharge Current	I <sub>DIS</sub>	0.2	A

PRE-RELEASE  
DESIGN ENG/DWG: 11/8/07  
MFG/SQ ENGR/DWG: 11/8/07  
QTY/DWG: 11/8/07

Environmental and Safety  
RoHS Compliant  
RECYCLED MATERIALS  
UL 1642  
UL 60950-1  
UL 60950-2  
UL 60950-3  
UL 60950-4  
UL 60950-5  
UL 60950-6  
UL 60950-7  
UL 60950-8  
UL 60950-9  
UL 60950-10  
UL 60950-11  
UL 60950-12  
UL 60950-13  
UL 60950-14  
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UL 60950-45  
UL 60950-46  
UL 60950-47  
UL 60950-48  
UL 60950-49  
UL 60950-50

CRITICAL QUALITY ATTRIBUTE  
KEY CHARACTERISTIC IDENTIFICATION  
BATTERY PACK, EXTERNAL  
BATTERY XPO2  
INVACARE CORP.  
ELYRIA, OHIO

1184130



**PRE-RELEASE**  
**DESIGN ENGR/Date:**  
**MFG/SQ ENGR/Date:**  
**QUALITY/Date:**

**INVACARE EXTERNAL BATTERY XPO2**

**KEY CHARACTERISTIC IDENTIFICATION**

△ = KEY CHARACTERISTIC IDENTIFICATION

□ = KEY CHARACTERISTIC IDENTIFICATION

○ = KEY CHARACTERISTIC IDENTIFICATION

▽ = KEY CHARACTERISTIC IDENTIFICATION

**INVACARE EXTERNAL BATTERY XPO2**

DATE: 11/21/13

DRAWN BY: S. WERNMAN

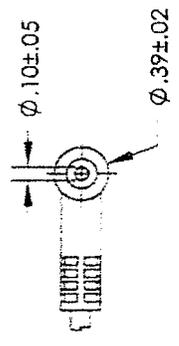
REV	BY	CHK	DATE	DESCRIPTION
1	SK	MS	11/21/13	INITIAL RELEASE
2	SK	MS	11/21/13	INITIAL RELEASE
3	SK	MS	11/21/13	INITIAL RELEASE
4	SK	MS	11/21/13	INITIAL RELEASE
5	SK	MS	11/21/13	INITIAL RELEASE
6	SK	MS	11/21/13	INITIAL RELEASE
7	SK	MS	11/21/13	INITIAL RELEASE
8	SK	MS	11/21/13	INITIAL RELEASE
9	SK	MS	11/21/13	INITIAL RELEASE
10	SK	MS	11/21/13	INITIAL RELEASE

**INVACARE CORP.**  
 ELYRIA, OHIO 44115

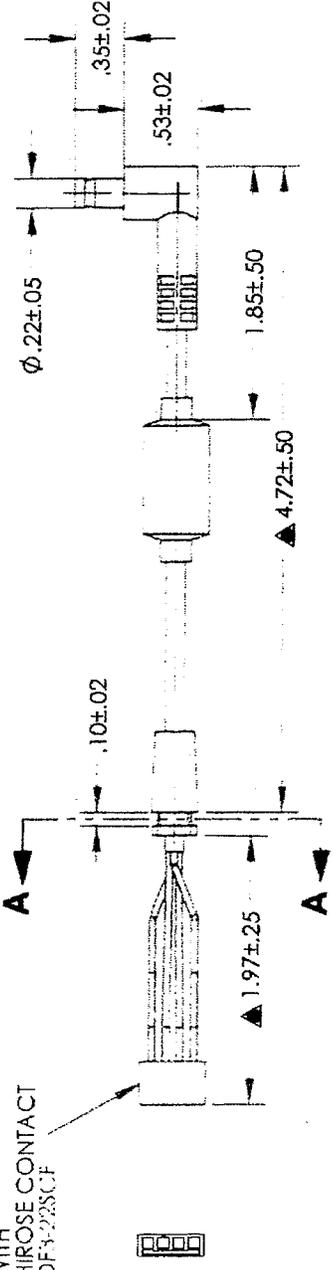
1180059

- REVISIONS (1321003):
- 00. 03/06/12 TH - CREATED DRAWING
  - 01. 03/20/12 TH - ADDED SECTION A-A AND MOUNTING PANEL GAP (.102) DIMENSION, CHGD VENDOR AND ADDED VENDOR P/N
  - 02. 03/29/12 TH - CORRECTED MFG P/N
  - 03. 04/10/12 TH - ADDED PIN OUT COLOR CODE TABLE
  - 04. 05/09/12 JMK - CANCEL 1221025, CHANGE TO 1221019
  - 05. 07/07/12 TH - CHANGE SPECIFICATION TO MATCH PROTEK PRINT
  - 06. 08/07/12 BK - CHG DIM .10±.02 WAS .102
  - 07. 06/18/13 BK - CHG DC# WAS 1221019; UPDATE TITLE BLOCK AND PRE-RELEASE STAMP
  - 08. 2/20/14 SW REV DESC.

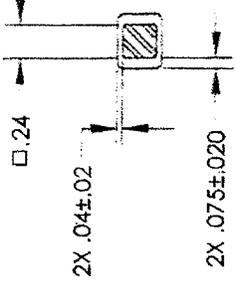
HIROSE DF3-4S-2C	
PIN 1	RED V+
PIN 2	BLACK V+
PIN 3	BLUE V-
PIN 4	WHITE V-



▲ HIROSE SOCKET DF3-4S-2C (PITCH 2mm) WITH HIROSE CONTACT DF3-22SCF



SECTION A-A

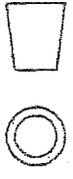


**PRE-RELEASE**

DESIGN ENGR/Date: *Fulza Ahmad 2/20/2013*

MFG/SQ ENGR/Date: *Tom Perry 4/26/14*  
 QUALITY/Date: *Tom Perry 4/24/14*

▲ = CRITICAL QUALITY ATTRIBUTE  
 ▲ = KEY CHARACTERISTIC IDENTIFICATION



NOTES:  
 ▲ 1. MANUFACTURER: PROTEK POWER, P/N 120314-01R

ASM, CABLE EXTERNAL BATTERY XPO2

**A**

INVACARE CORP. ELYRIA OHIO 1180059



**F2 Labs**  
16740 Peters Road  
Middlefield, Ohio 44062  
United States of America  
www.f2labs.com

## EMC TEST REPORT

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**Manufacturer:** Invacare Corporation  
One Invacare Way  
Elyria, Ohio 44036  
United States of America

**Product:** Portable Oxygen Concentrator

**Models:** XPO100B\*; XPO100

*\*Denotes actual model tested. Refer to Section 2.1 of this Test Report for more details.*

**Testing Commenced:** Apr. 4, 2014

**Testing Ended:** Apr. 4, 2014

**Summary of Test Results:** Page 4

**Deviations (if applicable):** N/A

**Standards:**

RTCA DO-160G – Environmental Conditions and Test Procedures for Airborne Equipment Testing Section 21, Category M



Order Number: F2LQ6037

Client: Invacare Corporation  
Models: XPO100B & XPO100

Evaluation Conducted by:

\_\_\_\_\_  
Joe Knepper, EMC Proj. Eng.

Report Reviewed by:

\_\_\_\_\_  
Ken Littell, EMC Tech. Mgr.

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Fax 440.632.5542

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Order Number: F2LQ6037

Client: Invacare Corporation  
Models: XPO100B & XPO100**TABLE OF CONTENTS**

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Order Number: F2LQ6037

Client: Invacare Corporation  
Models: XPO100B & XPO100

### GENERAL REPORT SUMMARY

This electromagnetic emission test report was generated by F2 Labs. The test report is based on testing performed by F2 Labs personnel according to the measurement procedures described in the test specifications given below and in the Test Procedures section of this report.

SECTION	TEST	RESULTS
6	Radiated Emissions: Internal Battery Power External Power Supply	Pass Pass
7	Conducted Emissions: External AC/DC Power Supply	Pass

Note: Pass/Fail criteria are based upon the following condition: Where the results are compared to published test standard or manufacturer specified limits, the PASS or FAIL opinion is considered without applying the laboratory stated measurement uncertainty.

Reports noted as a revision replace all previously issued reports and/or antecedent report revisions issued under this job number.