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RSPA-01-9890-1

DEPT OF TRANSPORTATION

01 JUN 11 PM 1:43

Associate Administrator for Hazardous Materials Safety
Research and Special Programs Administration
U.S. Department of Transportation
400 7th Street, SW
Washington, DC 20590-0001
Attention: Exemptions, DHM-31

Request: Exemption from packaging requirements 173.159 when shipping aircraft batteries via highway

Dear Sir,

I am requesting exemption from packaging requirements 173.159 when shipping aircraft batteries via highway.

Currently under 175.10 (a) (2) (i) "in place of the required packagings, packagings specially designed for the transport of aircraft spares and supplies may be used, provided such packagings provide at least an equivalent level of protection to those that would be required by this subchapter;"

This exception is being used by numerous airlines for the shipment of aircraft batteries on their own aircraft. I am requesting an exemption be provided for the shipment of Aircraft Batteries by ground using the same packaging exceptions cited in 175.10 (a) (2) (i). As an example such an exemption would provide for the use of the battery boxes which are presently used for shipment on aircraft. This will most certainly meet and/or exceed the packaging requirements in 173.159 which is required for ground transportation. We would be using CAT I ATA 300 containers only, and request the approval require this.

There is no issue regarding safety in this request. The airline boxes used to meet the exception in 175.10 have been proven over and over again by their use in air transportation. By granting this request it will not require USAirways to purchase additional packaging at substantial cost to the carrier in order to ship by ground. It will also not place USAirways in a position of using air when surface/ground transportation could be used. We have estimated that the cost to purchase an adequate number of boxes to ship all of our batteries by ground would be $150,000 +.

Please do not hesitate to contact me if you have any questions. My contact information is:

USAirways
PO BOX 12346
Pittsburgh, Pa 15231
Attn: Jay Knupp M/C Q105
Phone - 412-472-7322

Respectfully Submitted,

Jay Knupp
CO MAT/HazMat Coordinator
US Airways