

Name: Stephen P. Victor, Jr. PE

Organization: Fedco Electronics, Inc.

Comments: This document is very well thought out.

Please accept my comments as follows:

I have a suggestion for additional text on Page 11: Since lithium primary cells and batteries are not marked with the lithium content, my suggestion is to add notation to contact your supplier to determine the amount of lithium metal in the cells or batteries that you are shipping. The same is true for the Equivalent Lithium Content (ELC) of lithium-ion rechargeable cells and batteries. See additional comments below about the ELC

The table on Page 10 and the packaging limits for "small", "medium" and "large" on Page 13 are based on the current 49CFR Parts 171, 172, 173 & 175 HMR published in August of 2007.

However, on January 1, 2009 the recently approved ICAO Packing Instructions go into effect which will obsolete this proposed booklet.

One of the major changes is that lithium-ion rechargeable cells and batteries will be sized by Watt-Hours instead of ELC. (Which never made any sense anyway) The other major change is that there are new package gross weight limitations on air shipments of lithium primary and lithium-ion rechargeable cells and batteries for transport by passenger as well as cargo aircraft that are based based on the new ICAO Packing Instructions 965 and 968. In addition there are special packing instructions for lithium primary and lithium-ion rechargeable cells and batteries packse in or with equipment. See Packing Instructions 966,967,969 & 970.

Based on my comments, you can either publish this now with plans to revise the booklet in late fall, or hold off publishing this now and publish in the late fall with the new regs. I suggest waiting!

Sincerely,

Steve Victor
President
Fedco Electronica, Inc.
Fond du Lac, WI
Tel: 1-800-542-9761