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Dockets Management System
US. Department of Transportation
400 Seventh St. SW
Room PL 401
Washington, DC 20590

Re: **Docket Number RSPA-2002-13658 (HM-215) – Addition of Special Provision 161**

Dear Sir or Madam:

I am writing to comment on a portion of HM-215E – specifically, the proposal to add special provision 161 to the entry **Air bag inflators**, *or* **Air bag modules**, *or* **Seat-belt pretensioner**, / UN0503 / 1.4G. This special provision specifies that the UN0503 entry may not be used for domestic transportation, and that the more appropriate description is "Articles, pyrotechnic *for technical purposes*", UN0431.

It is TRW's position that the addition of special provision 161 does pose an unnecessary burden for international shippers. TRW is often issued the UN0503 / 1.4G classification for our early prototype designs developed in Europe (specifically Germany), and these prototypes must be shipped into and within the United States for development of the product.

As a manufacturer with international shipments, TRW follows the requirements of § 173.56(g) – we submit European approvals to the Associate Administrator so that we may have the DOT's acknowledgement of the acceptability of these approvals issued by the competent authority of a foreign government. This is the point where harmonization is key – the DOT's paperwork must match that issued by the foreign government so that our product flows smoothly through the transportation system.

Perhaps the burden would be reduced if the DOT's paperwork were to recognize the classification of **Airbag inflators** *or* **Airbag modules** *or* **Seat-belt pretensioner** / UN0503 / 1.4G classification when issuing the "confirmation" paperwork (the EX letter), yet also include a note stating that for domestic transportation of this product, the more appropriate description as required by special provision 161 is **Articles, pyrotechnic** *for technical purposes* / UN0431 / 1.4G.

Thank you for the opportunity to comment on this NPRM.

Sincerely,

Julie Smith

Julie Smith
Program Manager,
Cylinder Regulatory Compliance

(HM-215E Comments – Special Provision 161.doc)