



Dell Inc.
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To Whom It May Concern:

On January 1, 2011 ICAO (International Civil Aviation Organization), IATA (International Air Transport Association) and UNECE ADR 2011 regulations are in force for the transport of lithium and lithium ion batteries. All Dell batteries of less than 100 watt-hour capacity and equipment containing them comply with these regulations; and specifically comply with the UNECE ADR 2011 and the IATA Dangerous Goods Regulations 52nd Edition 2011.

Dell, Inc. manufactures, distributes and returns customer equipment containing lithium metal and lithium ion batteries. Those batteries are covered by the regulations specified above. Dell's lithium and lithium ion and lithium metal batteries, new or returned, contained in equipment, shipped with equipment, or shipped individually are excepted from the dangerous goods as defined under the IATA DGR 52nd Edition 2011 or the UNECE ADR 2011.

Dell declares the following:

- Dell's battery suppliers are bound to ensure that the battery packs meet transport regulations including Title 49 CFR 173.185 HMR- Special Provision 188, UNECE ADR 2011, IATA DGR and IMDG Code and the applicable exemptions thereunder.
- Lithium metal batteries shipped in Dell equipment have less than 2 grams of aggregate lithium content.
- Dell lithium ion batteries calculate to less than 8 grams of equivalent lithium content and are rated at less than 100 watt hours capacity. Cells contained within those battery packs calculate to less than 1.5 grams of equivalent lithium content and are rated at less than 20 watt hours capacity.
- Dell batteries are packaged in strong outer packaging, batteries are packed in inner packaging that encloses the batteries, and the batteries are protected against short circuit or accidental activation.
- Dell batteries returned under warranty are NOT returned for safety reasons. Dell batteries returned for Safety reasons that have the potential of generating a dangerous quantity of heat will be declared and offered as Class 9 dangerous goods.
- Dell batteries packed in master cartons comply with the 1.2 meter drop test as identified.
- Dell spare lithium Ion battery shipments are in master cartons containing weighing less than 10 kilograms.
- Dell spare lithium metal battery shipments are in master cartons containing weighing less than 2.5 kilograms.
- Dell Lithium ion and Lithium metal batteries shipped in equipment, with equipment, or individually are covered by and meet the requirements identified in Section II (formerly Part 1) of the IATA Packing Instructions 965, 966, 967, 968, 969, and 970. These items are labeled in accordance with the lithium battery handling label when required in compliance with the IATA lithium battery packing instructions.
- Designated packages must be handled with care and a flammability hazard may exist if the package is damaged.
- Information a specific battery may be downloaded from:
http://www.dell.com/regulatory_compliance_battery_msds
- For any additional information, please contact the following phone number: Toll Free (800) 424-9300, or (703) 527-3887.

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