



American Power Conversion

October 22, 2004

All American Power Conversion UPS products are built using special sealed lead acid batteries. American Power Conversion uses vendors who manufacture and test their batteries to ensure compliance with all standards associated with transportation of these products.

The batteries within APC units have been tested by the manufacturer to ensure compliance with U.S. Department of Transportation (DOT), International Civil Aviation Administration (ICAO), the International Air Transport Association (IATA), and International Maritime Dangerous Goods (IMDG) regulations. The batteries exceed the requirements of both ICAO and IATA relating to special provision "A 67" as defined by both organizations. The batteries are considered non-hazardous since they must and do pass the Vibration Test and Pressure Differential Test as required by the DOT in 49 CFR 173.159 (d), which was performed by the manufacturer of the batteries. In addition all the batteries APC ships meet the requirements of UN Number 2800 ("Batteries, wet, non-spillable).

The batteries in our units have been authorized for transportation on deck and under deck storage on either a passenger or cargo vessel by passing the Vibration and Attitude performance tests described in the 1992 edition of the International Maritime Dangerous Goods Code.

Respectively,

A handwritten signature in black ink, appearing to read "Jeffrey K. Larson", is written over a light blue horizontal line.

Jeffrey K. Larson
American Power Conversion
Environmental Programs Office Director