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To Whom It May Concern:

On January 1, 2009 new ICAO (International Civil Aviation Organization) and IATA (International Air Transport Association) regulations go into effect for the air transport of lithium batteries. Spectrum Brands manufactures and distributes Lithium Metal Batteries under the Rayovac brand name and those batteries are covered by these new regulations. A shipment of these batteries via air freight is covered by packing instruction 968. To summarize the requirements and our products:

Our lithium metal batteries have less than 2g of aggregate lithium content.

Our batteries have been tested and meet the requirements of the UN Manual of Tests and Criteria, Part III, subsection 38.3.

Our consumer packaged batteries are in master cartons weighing less than 2.5 kg G and for some bulk packs we are redesigning the packages to meet the weight limit and we expect to have the new compliant packaging in place by January 1.

The batteries are packed in strong outer cartons and the batteries are packed in inner packagings that completely enclose the batteries and the batteries are protected against short circuits.

Also each master carton passes the 1.2 m drop test as outlined.

Each carton will be labeled with the new lithium battery handling label.

Additionally remember any air shipments of primary (non-rechargeable) lithium batteries to/from or transiting the US are prohibited on passenger aircraft per the USDOT. A label noting the prohibition is required on every master carton even for ocean or truck shipments. Any person preparing or offering batteries for transport must be properly trained on these requirements. Finally Lithium Metal batteries packed with equipment are covered by packing instruction 969 and Lithium Metal contained in equipment is covered by packing instruction 970 and some requirements are different from those stated above.

Please see the Technical/OEM Section on [www.rayovac.com](http://www.rayovac.com) for more information.

Sincerely,

Mike Padesky  
Compliance Manager  
Spectrum Brands, Inc.

Jim Pilarzyk  
Director of OEM Sales  
Rayovac