

MAILING STANDARDS



June 16, 2004

Mr. Gary Rosenfield  
President RCS Rocket Motor Components, Inc.  
2113 W 850 N St  
Cedar City, UT 84720-2113

Dear Mr. Rosenfield:

This letter is in response to your May 9, 2004, request for approval to mail Division 1.4S model rocket motors and igniters. You also requested approval for all of your dealers and distributors who re-offer your devices for sale. Your list of dealers and distributors currently numbers about 89.

Model rocket motors are commonly known as toy propellant devices. Toy propellant devices contain a propellant material that is regulated as a hazard class 1 explosive. With your request, you furnished a copy of your U.S. Department of Transportation (DOT) Classification of Explosives determination and the DOT assigned exemption (EX) number for your rocket motors. In addition, you provided Material Safety Data Sheets (MSDS) for the following devices, rocket motors; EX-198205001, EX-2001040079 reload kits; EX-200110044, EX-200110042, EX-200110044, EX-2001030046, and EX-2001040079. All are classified as Division 1.4S explosives with identification number NA0323 and their proper shipping name is "Model rocket motor." Igniters: EX-999060157 and EX-999060157 are classified as Division 1.4S explosives with identification number UN0454.

Based on the documentation furnished, the brand names; AeroTech Consumer Aerospace, Econojet, Kosdon by RCS, Copperhead, and FirstFire will be distributed by RCS Rocket Motor Components, Inc. (RCS) as toy propellant devices that are classified as Division 1.4S explosives (NA0323 or UN0454) with the assigned EX number and contain 30 grams or less of propellant are approved for mailing in the domestic mail via surface transportation only. These devices are not permitted in the international mail. All model rocket motors and toy propellant devices not meeting these characteristics and the conditions specified in this letter are nonmailable.

This approval also extends to the dealers and distributors named on the list you furnished to us. The listed dealers and distributors may mail your RCS toy propellant devices under this approval, *provided* each of the following conditions is met:

- You furnish each of your dealers and distributors with a copy of this letter which specifies the mailability limits, proper packaging requirements, and mailer responsibilities that apply to the mailing of your RCS toy propellant devices.
- At the time of mailing, a copy of this letter is presented to postal personnel, and each mailpiece is properly packaged as specified in this letter.
- Once each year, you furnish this office with an updated listing of the names and addresses of all your dealers and distributors who re-offer your RCS toy propellant devices through the domestic U.S. mail.

Your RCS toy propellant devices may be mailed only when each of the following requirements is met:

**Mailability Requirements:**

- Mailable toy propellant devices may only be sent as domestic mail via surface transportation (i.e., Parcel Post rates only).
- Mailable toy propellant devices must be model rocket motors and igniters classed as Division 1.4S explosives and assigned identification numbers NA0323 and UN0454, respectively.

**Design Requirements:**

- Each toy propellant device must be capable of ignition by electrical means only.
- Each device may contain no more than 30g (1.07 ounces) of propellant, and produce less than 80 newton seconds of total impulse with thrust duration not less than 0.050 second.
- Each device must be constructed so that all chemical ingredients are preloaded into a cylindrical paper or similarly constructed nonmetallic tube that will not fragment into sharp, hard pieces.
- Each device must be designed so that it will not burst under normal conditions of use.
- Each device is incapable of spontaneous ignition under 500° F.
- Each device does not contain any type of explosive or pyrotechnic warhead other than a small, activation-charge parachute-recovery system.

**Packaging Requirements:**

*Primary Receptacle*

- Each device must be packed in a securely sealed primary receptacle.
- Multiple primary receptacles are permitted within a single mailpiece.

*Cushioning Material*

- The primary receptacle(s) must be surrounded by sufficient cushioning material to absorb shock and prevent damage to the primary receptacle and outer shipping container.

*Outer Shipping Container*

- The primary receptacle(s) and cushioning material must be packed within a strong and securely sealed outer shipping container made of fiberboard (200-pound test or greater).
- Each mailpiece must not exceed 25 pounds in weight.

*Required Markings*

- Each outer shipping container must be plainly marked on the address side with the words: "Toy Propellant Devices, Handle With Care" and "Surface Mail Only." (A DOT Division 1.4 hazardous materials warning label must not be used on parcels deposited in the U.S. mail.)
- A complete mailing address and return address must appear on the address side of each mailpiece.

3

NOTE: Full responsibility rests with the mailer to comply with all applicable DOT and Bureau of Alcohol, Tobacco and Firearms (ATF) regulations before mailing. Also be advised that full responsibility rests with the mailer for any violation of law, *Title 18, United States Code*, (18 USC) section 1716, which may result from placing improperly packaged or nonmailable devices in the mail.

Any toy propellant devices or model rocket motors that cannot meet all of the previously specified requirements for mailability, design, and packaging, may not be mailed under any conditions. This authorization will remain in effect until further notice or until such time changes to the mailing rules in the *Domestic Mail Manual* (DMM) or Postal Publication 52, *Hazardous, Restricted, and Perishable Mail*, conflict with the content of this approval.

If you have any questions about the content of this letter, please contact Bert Olsen of my staff at (202) 268-7276.

Sincerely,



Sherry Freda  
Manager

cc: Postmaster, 333 N Main St, Cedar City, UT 84720-9998  
Manager, Business Mail Entry, Salt Lake City District, 1760 W2100 S, Salt Lake City, UT  
84199-9651  
Managers, RCSCs

P&C:MS: HHOlsen:RCS:749734