



Mercedes-Benz

Mercedes-Benz USA, LLC
A Daimler Company

VIA [REDACTED] E-MAIL
(CAFE@DOT.GOV)

December 15, 2017

Mr. Jonathan Morrison
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue, NCC-111
Washington, DC 20590

Re: Pre-Model Year 2018 Report - Light Trucks

Dear Mr. Morrison:

As required by 49 CFR Part 537, Mercedes Benz USA, L.L.C. (MBUSA) on behalf of Daimler Aktiengesellschaft (DAG) hereby submits the **Pre-Model Year 2018 Report - Light Trucks**, with the requested footprint data. DAG's average fuel economy calculations were performed in accordance with the procedures as defined in 40 CFR 600.510-12.

This report is based on the best information presently available, and shows that DAG's **Pre-Model Year 2018 - Light Trucks** average fuel economy will be **27.6 mpg** with dual-fuel/alternative-fuel credits. The anticipated Light Trucks fuel economy value does not meet the projected DAG specific footprint-based fuel economy standard of **30.9 mpg**. The Light Trucks fuel economy value could be subject to civil penalties.

This report contains detailed sales volume information that is considered [REDACTED]. Under provisions of 49 CFR 512, Appendix B (3), MBUSA has submitted a request to the Office of the Chief Counsel of the NHTSA on behalf of DAG to provide [REDACTED] treatment for the material so designated by its enclosure within brackets until **December 31, 2018** (Copy of Certificate enclosed). Public release of this information prior to this date could potentially result in competitive harm to DAG, since other manufacturers could modify their own product plans based upon this information.

The marked information contained in this submission is proprietary and considered privileged and [REDACTED]. DAG and MBUSA have taken measures to ensure the marked information contained in this submission has not been disclosed or otherwise made available to any person other than DAG and affiliates and suppliers. Insofar as is known by DAG, except to DAG's subsidiary, MBUSA, portions of the submission may have been made available as necessary for the purpose of obtaining advice and assistance from counsel and other [REDACTED] advisors. Such disclosures do not compromise the [REDACTED] nature of the information because of the close business relationship between MBUSA and DAG, nor do selective disclosures to DAG and MBUSA; this information has never appeared publicly.



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In Appendix B (2) of 49 CFR Part 512, the Administrator has determined that this type of information would presumptively be likely to result in substantial competitive harm if disclosed to the public.

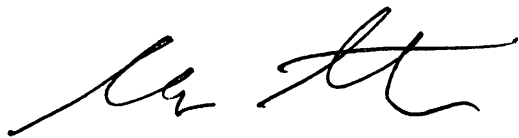
A disclosure of the marked information would result in substantial competitive harm to DAG and MBUSA since competitors would thereby obtain information about our future marketing plans. Competitors may use this information to adjust their own production plans to obtain a competitive advantage.

Disclosure of the marked information is not likely to impair other protected government interests.

We request that confidentiality be granted for the information marked confidential in this submission until **December 31, 2018**, and would appreciate you notifying us of your decision when practicable. If the request is denied, please return the [REDACTED] information and we will provide an amended response.

If you have any questions relative to this report, or if further information is needed, please contact Gregory Gunther at gregory.gunther@mbusa.com.

Sincerely,



Gregory Gunther
Department Manager
Vehicle Compliance and Analysis

Enclosure: One (1) Certificate in Support of Request for [REDACTED]
Two (2) Copies of [REDACTED] Version
One (1) Copy of Non-[REDACTED] Version
One (1) Copy of [REDACTED] Version in Excel Format

**CERTIFICATE IN SUPPORT OF
REQUEST FOR [REDACTED]**

I, Gregory Gunther, pursuant to the provisions of 49 CFR Part 512, state as follows:

(1) I am the Department Manager of Vehicle Compliance and Analysis for Mercedes-Benz USA, L.L.C. (MBUSA), and I am authorized by MBUSA and its parent company, Daimler Aktiengesellschaft (DAG), to execute this certificate on its behalf;

(2) I certify that the information contained in the **Pre-Model Year 2018 Report – Light Trucks** is [REDACTED] and proprietary data and is being submitted with the claim that it is entitled to [REDACTED] treatment under 5 U.S.C. 552(b)(4) (as incorporated by reference in and modified by the statute under which the information is being submitted);

(3) I hereby request that the information contained in the **Pre-Model Year 2018 Report – Light Trucks** be protected until **December 31, 2018**;


(4) This certification is based on the information provided by the responsible personnel who have authority in the normal course of business to release the information for which a claim of [REDACTED] has been made to ascertain whether such information has ever been released outside MBUSA or DAG;

(5) Based upon that information, to the best of my knowledge, information and belief, the information for which MBUSA has claimed [REDACTED] treatment has never been released or become available outside of MBUSA or DAG, except as hereinafter specified:

(6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside of MBUSA or DAG because of unauthorized or inadvertent disclosure except as stated in Paragraph 5; and

(7) I certify under penalty of perjury that the foregoing is true and correct.

Executed on the 15th day of **December 2017**.



Gregory Gunther

2018 PRE-MODEL YEAR – LIGHT TRUCKS

DAIMLER AG PROJECTED CORPORATE AVERAGE FUEL ECONOMY

Corporate Average Fuel Economy	27.6 mpg
Footprint-Based Fuel Economy Standard	30.9 mpg

Based on best information presently available, the above projections represent DAG's projected average fuel economy for the **Pre-Model Year 2018** for the purpose of the Act. Calculations were performed in accordance with the procedures defined in 40 CFR 600.510-12. As required by S537.9, estimated fuel economy values are included in this report. These estimated values are for those running changes that have been submitted to the EPA and are currently involved in the running change approval process. These values were obtained from fuel economy data vehicles that were tested in accordance with applicable exhaust emission test procedures and comply with 2018 exhaust emission standards as defined in 40 CFR Part 86. All mileage was accumulated on the durability driving cycle.

[REDACTED] BUSINESS INFORMATION

2018 Pre-Model Year – Light Trucks – Model Type Fuel Economy Data

IWC [lbs]	ETW [lbs]	Model Name	Body Style	Engine	MB Vehicle Code	Transm.	Transmission Class	GWR [lbs]	Approach Angle (≥28°)	Breakover Angle (≥14°)	Departure Angle (≥20°)	Running Clearance (≥200mm)	Front Axle Clearance (≥180mm)	Rear Axle Clearance (≥180mm)	Base Fuel (MPG)	E85 Fuel (MPG)	Proj. Model Sales
																	8053
																	8381
																	30312
																	152
																	883
																	168
																	2267
																	305
																	3907
																	39
																	1134
																	200
																	302
																	16295
																	23544
																	118
																	238
																	1
																	2271
																	252
																	744
																	142
																	133
																	309
																	4824
																	714
																	20370
																	3908
																	895
																	960
																	176
																	2043
																	58
																	3920
																	5977

Projected Light Truck Sales: 143995

[REDACTED] BUSINESS INFORMATION

2018 Pre-Model Year – Light Trucks – Model Type Fuel Economy Data

IWC [lbs]	ETW [lbs]	Model Name	Body Style	Engine	MB Vehicle Code	Transm.	Transmission Class	GWR [lbs]	Approach Angle (≥28°)	Breakover Angle (≥14°)	Departure Angle (≥20°)	Running Clearance (≥200mm)	Front Axle Clearance (≥180mm)	Rear Axle Clearance (≥180mm)	Base Fuel (MPG)	E85 Fuel (MPG)	Proj. Model Sales
																	8053
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																	39
																	1134
																	200
																	302
																	16295
																	23544
																	118
																	238
																	1
																	2271
																	252
																	744
																	142
																	133
																	309
																	4824
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																	3908
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																	960
																	176
																	2043
																	58
																	3920
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Projected Light Truck Sales: 143995

NON [REDACTED] BUSINESS INFORMATION

2018 Pre-Model Year – Light Trucks – Model Type Fuel Economy Data

IWC [lbs]	ETW [lbs]	Model Name	Body Style	Engine	MB Vehicle Code	Transm.	Transmission Class	GVWR [lbs]	Approach Angle (≥28°)	Breakover Angle (≥14°)	Departure Angle (≥20°)	Running Clearance (≥200mm)	Front Axle Clearance (≥180mm)	Rear Axle Clearance (≥180mm)	Base Fuel (MPG)	E85 Fuel (MPG)	Proj. Model Sales
4000	3875	GLA 250 4MATIC (ULEV)	MPV	2.0L I-4 Turbo	X156E20DETC 4x4	AM-7 (4x4)	4 wd Auto 7 OD L/U	4442	19.7	20.6	30.8	204	224	247	35.1		[]
4000	3875	GLA 250 4MATIC (FFV)	MPV	2.0L I-4 Turbo	X156E20DETC 4x4 FFV	AM-7 (4x4)	4 wd Auto 7 OD L/U	4442	19.7	20.6	30.8	204	224	247	35.1	25.6	[]
4500	4500	GLC 300 4MATIC	MPV	2.0L I-4 Turbo	X253E20DETC 4x4 (LDT)	L-9 (4x4)	4 wd Auto 9 OD L/U	5214	28.8	18.6	21	202	202	245	31.3		[]
4500	4500	GLC 300 4MATIC (Air-Susp.)	MPV	2.0L I-4 Turbo	X253E20DETC 4x4 (LDT)	L-9 (4x4)	4 wd Auto 9 OD L/U	5214	29.3	18.7	21	207	207	245	31.3		[]
5000	5000	GLC 350 e 4MATIC	MPV	2.0L I-4 Turbo	X253E20DETC P2-85 PI-Hybrid	L-7 (4x4)	4 wd Auto 7 OD L/U	5743	29.3	18.7	21	207	207	245	58.5		[]
5000	5000	GLC 350 e 4MATIC (Air-Susp.)	MPV	2.0L I-4 Turbo	X253E20DETC P2-85 PI-Hybrid	L-7 (4x4)	4 wd Auto 7 OD L/U	5743	29.3	18.7	21	207	207	245	58.5		[]
4500	4500	AMG GLC 43 4MATIC (Std. Air-Susp.)	MPV	3.0L V-6 Turbo	X253E30DETC 4x4 Sport AMG	L-9 (4x4)	4 wd Auto 9 OD L/U	5423	29.3	18.7	21	207	207	245	26.3		[]
4500	4500	AMG GLC 63 4MATIC (Std. Air-Susp.)	MPV	4.0L V-8 Turbo	X253E40DETC AMG	L-9 (4x4)	4 wd Auto 9 OD L/U	5688	29.3	18.7	21	207	207	245	24.2		[]
4500	4500	GLC 300 4MATIC Coupe	MPV	2.0L I-4 Turbo	C253E20DETC 4x4 (LDT)	L-9 (4x4)	4 wd Auto 9 OD L/U	5291	28.8	18.6	21	202	202	245	31.5		[]
4500	4500	GLC 300 4MATIC Coupe (Air-Susp.)	MPV	2.0L I-4 Turbo	C253E20DETC 4x4 (LDT)	L-9 (4x4)	4 wd Auto 9 OD L/U	5291	29.3	18.7	21	207	207	245	31.5		[]
4500	4500	AMG GLC 43 4MATIC Coupe (Std. Air-Susp.)	MPV	3.0L V-6 Turbo	C253E30DETC 4x4 Sport AMG	L-9 (4x4)	4 wd Auto 9 OD L/U	5423	29.3	18.7	21	207	207	245	26.6		[]
4500	4500	AMG GLC 63 4MATIC Coupe (Std. Air-Susp.)	MPV	4.0L V-8 Turbo	C253E40DETC AMG	L-9 (4x4)	4 wd Auto 9 OD L/U	5710	29.3	18.7	21	207	207	245	24.2		[]
4500	4500	AMG GLC 63 S 4MATIC Coupe (Std. Air-Susp.)	MPV	4.0L V-8 Turbo	C253E40DETC AMG S	L-9 (4x4)	4 wd Auto 9 OD L/U	5710	29.3	18.7	21	207	207	245	24.2		[]
5000	5000	GLE 350	MPV	3.5L V-6	W166E35DEH 4x2	L-7	2 wd Auto 7 OD L/U	6173	23	17	20.2 - 25.7	210	210	233	26.4		[]
5000	5250	GLE 350 4MATIC (ULEV)	MPV	3.5L V-6	W166E35DEH 4x4	L-7 (4x4)	4 wd Auto 7 OD L/U	6283	23	17	20.2 - 25.7	210	210	233	25.3		[]
5000	5250	GLE 350 4MATIC (ULEV) (Air-Susp.)	MPV	3.5L V-6	W166E35DEH 4x4	L-7 (4x4)	4 wd Auto 7 OD L/U	6283	23	17	21.5 - 25.7	210	210	233	25.3		[]
5000	5250	GLE 350 4MATIC (FFV)	MPV	3.5L V-6	W166E35DEH 4x4 FFV	L-7 (4x4)	4 wd Auto 7 OD L/U	6283	23	17	20.2 - 25.7	210	210	233	25.3	18.9	[]
5000	5250	GLE 350 4MATIC (FFV) (Air-Susp.)	MPV	3.5L V-6	W166E35DEH 4x4 FFV	L-7 (4x4)	4 wd Auto 7 OD L/U	6283	23	17	21.5 - 25.7	210	210	233	25.3	18.9	[]
5500	5500	AMG GLE 43 4MATIC	MPV	3.0L V-6 Turbo	W166E30DETC 4x4 Sport AMG	L-9 (4x4)	4 wd Auto 9 OD L/U	6460	23	17	20.2 - 25.7	210	210	233	25.3		[]
5500	5500	AMG GLE 43 4MATIC (Air-Susp.)	MPV	3.0L V-6 Turbo	W166E30DETC 4x4 Sport AMG	L-9 (4x4)	4 wd Auto 9 OD L/U	6460	23	17	21.5 - 25.7	210	210	233	25.3		[]
6000	6000	GLE 550 e 4MATIC	MPV	3.0L V-6 Turbo	W166E30DETC P2-85 PI-Hybrid	L-7 (4x4)	4 wd Auto 7 OD L/U	6724	23	17	20.2 - 25.7	210	210	233	49.1		[]
6000	6000	GLE 550 e 4MATIC (Air-Susp.)	MPV	3.0L V-6 Turbo	W166E30DETC P2-85 PI-Hybrid	L-7 (4x4)	4 wd Auto 7 OD L/U	6724	23	17	21.5 - 25.7	210	210	233	49.1		[]
5500	5500	AMG GLE 63 (Std. Air-Susp)	MPV	5.5L V-8 Turbo	W166E55DETC 4x4 AMG	L-7 (4x4)	4 wd Auto 7 OD L/U	6460	21	19	24	231	232	230	19.5		[]
5500	5500	AMG GLE 63 S (Std. Air-Susp)	MPV	5.5L V-8 Turbo	W166E55DETC 4x4 AMG S	L-7 (4x4)	4 wd Auto 7 OD L/U	6724	21	19	24	231	232	230	19.5		[]
5500	5500	AMG GLE 43 4MATIC Coupe (Std. Air-Susp)	MPV	3.0L V-6 Turbo	C292E30DETC 4x4 Sport AMG	L-9 (4x4)	4 wd Auto 9 OD L/U	6393	23	17	20 - 25	211	211	211	25.1		[]
5500	5500	AMG GLE 63 S Coupe (Std. Air-Susp)	MPV	5.5L V-8 Turbo	C292E55DETC AMG S 4x4	L-7 (4x4)	4 wd Auto 7 OD L/U	6823	22	20	22 - 24	253	276	276	19.6		[]
6000	6000	GLS 450 4MATIC (Std. Air-Susp)	MPV	3.0L V-6 Turbo	X166E30DETC 4x4	L-9 (4x4)	4 wd Auto 9 OD L/U	7165	20 - 26	15 - 22	21 - 26	200 - 285	195 - 285	195 - 285	24.1		[]
6000	6000	GLS 550 4MATIC (Std. Air-Susp)	MPV	4.7L V-8 Turbo	X166E46DETC 4x4	L-9 (4x4)	4 wd Auto 9 OD L/U	7165	20 - 26	15 - 22	21 - 26	200 - 285	195 - 285	195 - 285	20.5		[]
6000	6000	AMG GLS 63 (Std. Air-Susp)	MPV	5.5L V-8 Turbo	X166E55DETC 4x4 AMG	L-7 (4x4)	4 wd Auto 7 OD L/U	7165	23	18.9	21.9	249	249	239	19.2		[]
6000	6000	G 550	MPV	4.0L V-8 Turbo	G463E40DETC 4x4	L-7 (4x4)	4 wd Auto 7 OD L/U	7055	36	24	29	205	205	205	17.8		[]
7000	7000	G 550 (4x4)*2	MPV	4.0L V-8 Turbo	G463E40DETC 4x42	L-7 (4x4)	4 wd auto 7 OD L/U	7694	51.6	44.6-47.4	43.8	438	438	438	14.2		[]
6000	6000	AMG G 63	MPV	5.5L V-8 Turbo	G463E55DETC 4x4 AMG	L-7 (4x4)	4 wd Auto 7 OD L/U	7055	28	24	30	229	224	233	16.7		[]
6000	6000	AMG G 65	MPV	6.0L V-12 Turbo	G463E60TC AMG	L-7 (4x4)	4 wd Auto 7 OD L/U	7055	28	24	30	229	224	233	15.0		[]
4500	4500	Metris (Cargo Van)	Truck	2.0L I4 Turbo	L447E20DELA (Cargo)	L-7	2 wd Auto 7 OD L/U	6724	18.6	18.6	16.9	176	213	212	29.7		[]
5000	5250	Metris (Passenger Van)	MPV	2.0L I4 Turbo	L447E20DELA	L-7	2 wd Auto 7 OD L/U	6724	17.4	17.1	15.5	158	147	194	27.6		[]

LT Attribute

Projected Light Truck Sales: []

NON [REDACTED] BUSINESS INFORMATION

2018 Pre-Model Year – Light Trucks – Model Type Technical Data

Model Name	Curb Weight [lbs]	SAE hp	SAE kW	Engine Code	N/V	Roadload HP	Axle Ratio	Proj. Model Sales	Passenger Volume [ft³]	Cargo Volume [ft³]	Interior Volume Index	3 rows of seats	Base Tire		Front Track Width [in]	Rear Track Width [in]	Avg. Track Width [in]	Wheelbase [in]	Footprint [ft²]
													Front Tire Size	Rear Tire Size					
GLA 250 4MATIC (ULEV)	3450	208	155	M270-20DETC	28.1	12.6	2.65	[]	89.079	41.838	130.900		235/45 R19	235/45 R19	61.8	61.4	61.6	106.3	45.5
GLA 250 4MATIC (FFV)	3450	208	155	M270-20DETC-F	28.1	12.6	2.65	[]	89.079	41.838	130.900		235/45 R19	235/45 R19	61.8	61.4	61.6	106.3	45.5
GLC 300 4MATIC	4001	241	180	M274-20DETC	23.3	14.7	3.27	[]	101.017	24.258	125.300		235/60 R18	235/60 R18	63.8	63.7	63.8	113.1	50.1
GLC 300 4MATIC (Air-Susp.)	4001	241	180	M274-20DETC	23.3	14.7	3.27	[]	101.017	24.258	125.300		235/60 R18	235/60 R18	63.8	63.7	63.8	113.1	50.1
GLC 350 e 4MATIC	4564	208	155	M274-20HP	28.2	15.6	3.27	[]	101.017	24.258	125.300		235/60 R18	235/60 R18	63.8	63.7	63.8	113.1	50.1
GLC 350 e 4MATIC (Air-Susp.)	4564	208	155	M274-20HP	28.2	15.6	3.27	[]	101.017	24.258	125.300		235/60 R18	235/60 R18	63.8	63.7	63.8	113.1	50.1
AMG GLC 43 4MATIC (Std. Air-Susp.)	4145	362	270	M276-30DETC-S	26.5	15.8	3.69	[]	101.017	24.258	125.300		255/45 R20	285/40 R20	63.8	63.7	63.8	113.1	50.1
AMG GLC 63 4MATIC (Std. Air-Susp.)	4462	469	350	M177-40DETC-S	23.2	17.9	3.27	[]	101.017	24.258	125.300		265/45 R20	295/40 R20	63.5	63.5	63.5	113.1	49.9
GLC 300 4MATIC Coupe	4045	241	180	M274-20DETC	23.3	14.7	3.27	[]	94.352	18.051	112.400		235/60 R18	235/60 R18	63.8	63.7	63.8	113.1	50.1
GLC 300 4MATIC Coupe (Air-Susp.)	4045	241	180	M274-20DETC	23.3	14.7	3.27	[]	94.352	18.051	112.400		235/60 R18	235/60 R18	63.8	63.7	63.8	113.1	50.1
AMG GLC 43 4MATIC Coupe (Std. Air-Susp.)	4140	362	270	M276-30DETC-S	26.5	15.8	3.69	[]	94.352	18.051	112.400		255/45 R20	285/40 R20	63.8	63.7	63.8	113.1	50.1
AMG GLC 63 4MATIC Coupe (Std. Air-Susp.)	4475	469	350	M177-40DETC-S	23.2	17.9	3.27	[]	94.352	18.051	112.400		265/45 R20	295/40 R20	63.5	63.5	63.5	113.1	49.9
AMG GLC 63 S 4MATIC Coupe (Std. Air-Susp.)	4511	503	375	M177-40DETC-S	23.2	17.9	3.27	[]	94.352	18.051	112.400		265/45 R20	295/40 R20	63.5	63.5	63.5	113.1	49.9
GLE 350	4652	302	225	M276-35DEH	32.0	17.0	3.69	[]	103.176	44.527	147.700		255/50 R19	255/50 R19	64.6	65.2	64.9	114.8	51.7
GLE 350 4MATIC (ULEV)	4784	302	225	M276-35DEH	31.8	18.2	3.69	[]	103.176	44.527	147.700		255/50 R19	255/50 R19	64.6	65.2	64.9	114.8	51.7
GLE 350 4MATIC (ULEV) (Air-Susp.)	4784	302	225	M276-35DEH	31.8	18.2	3.69	[]	103.176	44.527	147.700		255/50 R19	255/50 R19	65.2	65.9	65.6	114.8	52.3
GLE 350 4MATIC (FFV)	4784	302	225	M276-35F	31.8	18.2	3.69	[]	103.176	44.527	147.700		255/50 R19	255/50 R19	64.6	65.2	64.9	114.8	51.7
GLE 350 4MATIC (FFV) (Air-Susp.)	4784	302	225	M276-35F	31.8	18.2	3.69	[]	103.176	44.527	147.700		255/50 R19	255/50 R19	65.2	65.9	65.6	114.8	52.3
AMG GLE 43 4MATIC	4987	385	287	M276-30DETC-S	24.5	16.9	3.46	[]	103.176	44.527	147.700		265/45 R20	265/45 R20	64.6	65.2	64.9	114.8	51.7
AMG GLE 43 4MATIC (Air-Susp.)	4987	385	287	M276-30DETC-S	24.5	16.9	3.46	[]	103.176	44.527	147.700		265/45 R20	265/45 R20	65.1	65.9	65.5	114.8	52.2
GLE 550 e 4MATIC	5490	436	325	M276-30HP	28.0	18.3	3.27	[]	103.176	44.527	147.700		265/45 R20	265/45 R20	64.6	65.2	64.9	114.8	51.7
GLE 550 e 4MATIC (Air-Susp.)	5490	436	325	M276-30HP	28.0	18.3	3.27	[]	103.176	44.527	147.700		265/45 R20	265/45 R20	65.1	65.9	65.5	114.8	52.2
AMG GLE 63 (Std. Air-Susp)	5203	550	410	M157-55DETC	30.0	21.1	3.47	[]	103.176	44.527	147.700		295/35 R21	295/35 R21	66.4	67.1	66.8	114.8	53.3
AMG GLE 63 S (Std. Air-Susp)	5225	577	430	M157-55DETC	30.0	21.1	3.47	[]	103.176	44.527	147.700		295/35 R21	295/35 R21	66.4	67.1	66.8	114.8	53.3
AMG GLE 43 4MATIC Coupe (Std. Air-Susp)	4960	385	287	M276-30DETC-S	24.8	17.4	3.69	[]	101.406	37.517	138.900		275/45 R21	315/40 R21	65.1	65.9	65.5	114.8	52.2
AMG GLE 63 S Coupe (Std. Air-Susp)	5379	577	430	M157-55DETC	30.0	19.1	3.69	[]	101.406	37.517	138.900		285/40 R22	325/35 R22	65.2	67.1	66.2	114.8	52.8
GLS 450 4MATIC (Std. Air-Susp)	5379	362	270	M276-30DETC-S	22.1	18.7	3.27	[]	144.024	16.150	160.200		275/50 R20	275/50 R20	64.8	65.6	65.2	121.1	54.8
GLS 550 4MATIC (Std. Air-Susp)	5622	449	335	M278-46DETC	22.4	20.1	3.27	[]	144.024	16.150	160.200		295/40 R21	295/40 R21	66.0	66.8	66.4	121.1	55.8
AMG GLS 63 (Std. Air-Susp)	5754	577	430	M157-55DETC	28.8	20.8	3.47	[]	144.024	16.150	160.200		295/40 R21	295/40 R21	66.0	66.8	66.4	121.1	55.8
G 550	5820	416	310	M176-E40DETC	33.5	29.5	3.58	[]	94.260	38.560	132.800		275/55 R19	275/55 R19	59.6	59.6	59.6	112.2	46.4
G 550 (4x4)*2	6691	416	310	M176-E40DETC	37.5	38.6	5.38	[]	94.260	34.262	NA		325/55 R22	325/55 R22	59.6	59.6	59.6	112.2	46.4
AMG G 63	5833	563	420	M157-55DETC	29.7	26.1	3.58	[]	94.260	38.560	132.800		275/50 R20	275/50 R20	59.1	59.1	59.1	112.2	46.0
AMG G 65	5924	621	463	M279-60TC	29.7	26.0	3.6	[]	94.260	38.560	132.800		295/40 R21	295/40 R21	58.3	58.3	58.3	112.2	45.4
Metris (Cargo Van)	4222	208	155	M274-20DETC-C	32.6	16.8	3.5	[]	49.087	186.000	NA		225/55 R17	225/55 R17	65.6	64.8	65.2	126.0	57.0
Metris (Passenger Van)	4851	208	155	M274-20DETC-C	32.6	17.4	3.5	[]	NA	38.000	NA	Yes	225/55 R17	225/55 R17	65.6	64.8	65.2	126.0	57.0

LT Attribute

[Redacted] **BUSINESS INFORMATION**

2018 Pre-Model Year – Light Trucks – Model Type Footprint Data

Model Year **2018**
Compliance Category **LT**

MT Index	Carline Mfr Cd	Division Code	Carline Code	Carline Name	Drive System	Engine Name / Description	Transmission Class	Footprint Index	Footprint Description	Data Used In Calculations				Calculation Values				Model Year	Comp Cat				
										Width - Inch (1)		WhlBse Inch (1)	D/I	ProdVol FE	TLAAS Y/N	ProdVol GHG	Footprint SqFt			Target FE	Target GHG	Weighted FE	Weighted GHG
										Front	Rear												
										8,053			8,053				234.98687	1998754.6	2018	LT			
										8,381			8,381				244.55792	2080164.2					
										30,312			30,312				959.24051	8187271.2					
										152			152				4.81013	41055.2	Prod Vol	-			
										883			883				27.94304	238498.3	Weighted	-			
										168			168				5.31646	45376.8	UnRnd Wgt Avg	-			
										1,134			1,134				71.74051	612316.7	Rnd Wgt Avg	-			
										305			305				9.61842	82075.5	Min PV Dom	-			
										3,907			3,907				123.63924	1055280.7	Rnd Std	-			
										39			39				1.23418	10533.9	Prod Vol	-			
										1,134			1,134				35.88608	306293.4	Weighted	-			
										200			200				6.30716	53820.0	UnRnd Std	-			
										302			302				9.52381	81268.2	Rnd Std	-			
										16,295			16,295				529.57426	4525121.5	Prod Vol	143,995			
										23,544			23,544				765.16087	6538168.8	Weighted	4656.348555			
										118			118				3.87266	33099.0	UnRnd Std	30.92444612			
										238			238				7.73481	66092.6	Rnd Std	30.9			
										1			1				0.03282	280.5	Prod Vol	143,995			
										2,271			2,271				73.80565	630656.7	Weighted	39777014.9			
										252			252				8.25688	70585.2	UnRnd Std	276.2388618			
										744			744				24.17940	206608.8	Rnd Std	276			
										142			142				4.65269	39774.2	Prod Vol	0			
										133			133				4.43629	37944.9	Weighted	0			
										309			309				10.30687	88157.7	UnRnd Wgt Avg	-			
										4,824			4,824				158.06029	1351202.4	UnRnd Wgt Avg	-			
										714			714				23.62674	201990.6	Rnd Wgt Avg	-			
										20,370			20,370				695.93440	5956188.0	x 1.25	-			
										3,908			3,908				135.60028	1161457.6	Rnd Std	-			
										895			895				31.05482	265994.0		-			
										960			960				28.46975	242400.0		-			
										176			176				5.21945	44440.0		-			
										2,043			2,043				60.15901	511975.8		-			
										58			58				1.68899	14366.6		-			
										3,920			3,920				138.51590	1187368.0		-			
										5,977			5,977				211.20141	1810433.3		-			

2018 Pre-Model Year – Light Trucks – Model Type Footprint Data

Model Year **2018**
Compliance Category **LT**

MT Index	Carline Mfr Cd	Division Code	Carline Code	Carline Name	Drive System	Engine Name / Description	Transmission Class	Footprint Index	Footprint Description	Data Used In Calculations				Calculation Values					Model Year	Comp Cat			
										Width - Inch (1)		WhlBse Inch (1)	D/I	ProdVol FE	TLAAS Y/N	ProdVol GHG	Footprint SqFt	Target FE			Target GHG	Weighted FE	Weighted GHG
										Front	Rear												
											8,053								234.98687	1998754.6	2018	LT	
											8,381									244.55792	2080164.2		
											30,312									959.24051	8187271.2	Prod Vol	-
											152									4.81013	41055.2	Weighted	-
											883									27.94304	238498.3	UnRnd Wgt Avg	-
											168									5.31646	45376.8	Rnd Wgt Avg	-
											1,134									71.74051	612316.7	Min PV Dom	-
											305									9.61842	82075.5	Rnd Std	-
											3,907									123.63924	1055280.7		
											39									1.23418	10533.9	Prod Vol	-
											1,134									35.88608	306293.4	Weighted	-
											200									6.30716	53820.0	UnRnd Std	-
											302									9.52381	81268.2	Rnd Std	-
											16,295									529.57426	4525121.5		
											23,544									765.16087	6538168.8	Prod Vol	143,995
											118									3.87266	33099.0	Weighted	4656.348555
											238									7.73481	66092.6	UnRnd Std	30.92444612
											1									0.03282	280.5	Rnd Std	30.9
											2,271									73.80565	630656.7		
											252									8.25688	70585.2	Prod Vol	143,995
											744									24.17940	206608.8	Weighted	39777014.9
											142									4.65269	39774.2	UnRnd Std	276.2388618
											133									4.43629	37944.9	Rnd Std	276
											309									10.30687	88157.7		
											4,824									158.06029	1351202.4	Prod Vol	0
											714									23.62674	201990.6	Weighted	0
											20,370									695.93440	5956188.0	UnRnd Wgt Avg	-
											3,908									135.60028	1161457.6	Rnd Wgt Avg	-
											895									31.05482	265994.0	x 1.25	-
											960									28.46975	242400.0	Rnd Std	-
											176									5.21945	44440.0		
											2,043									60.15901	511975.8		
											58									1.68899	14366.6		
											3,920									138.51590	1187368.0		
											5,977									211.20141	1810433.3		

2018 Pre-Model Year – Light Trucks – Model Type Footprint Data

Model Year **2018**
Compliance Category **LT**

MT Index	Carline Mfr Cd	Division Code	Carline Code	Carline Name	Drive System	Engine Name / Description	Transmission Class	Footprint Index	Footprint Description	Data Used In Calculations						Calculation Values					
										Width Front	Inch (1) Rear	WhlBse Inch (1)	D/I	ProdVol FE	TLAAS Y/N	ProdVol GHG	Footprint SqFt	Target FE	Target GHG	Weighted FE	Weighted GHG
505	MBX	1	505	GLA 250 4MATIC (ULEV)	4	M270-20DETC	AM-7	1		61.8	61.4	106.3	I		N		45.5	34.27	248.2		
35	MBX	1	505	GLA 250 4MATIC (FFV)	4	M270-20DETC-F	AM-7	1		61.8	61.4	106.3	I		N		45.5	34.27	248.2		
112	MBX	1	112	GLC 300 4MATIC	4	M274-20DETC	L-9	1		63.8	63.7	113.1	I		N		50.1	31.60	270.1		
112	MBX	1	112	GLC 300 4MATIC (Air-Susp.)	4	M274-20DETC	L-9	1		63.8	63.7	113.1	I		N		50.1	31.60	270.1		
101	MBX	1	101	GLC 350 e 4MATIC	4	M274-20HP	L-7	1		63.8	63.7	113.1	I		N		50.1	31.60	270.1		
101	MBX	1	101	GLC 350 e 4MATIC (Air-Susp.)	4	M274-20HP	L-7	1		63.8	63.7	113.1	I		N		50.1	31.60	270.1		
310	MBX	1	310	AMG GLC 43 4MATIC (Std. Air-Susp.)	4	M276-30DETC-S	L-9	1		63.8	63.7	113.1	I		N		50.1	31.60	270.1		
511	MBX	1	511	AMG GLC 63 4MATIC (Std. Air-Susp.)	4	M177-40DETC-S	L-9	1		63.5	63.5	113.1	I		N		49.9	31.71	269.1		
130	MBX	1	130	GLC 300 4MATIC Coupe	4	M274-20DETC	L-9	1		63.8	63.7	113.1	I		N		50.1	31.60	270.1		
130	MBX	1	130	GLC 300 4MATIC Coupe (Air-Susp.)	4	M274-20DETC	L-9	1		63.8	63.7	113.1	I		N		50.1	31.60	270.1		
311	MBX	1	311	AMG GLC 43 4MATIC Coupe (Std. Air-Susp.)	4	M276-30DETC-S	L-9	1		63.8	63.7	113.1	I		N		50.1	31.60	270.1		
512	MBX	1	512	AMG GLC 63 4MATIC Coupe (Std. Air-Susp.)	4	M177-40DETC-S	L-9	1		63.5	63.5	113.1	I		N		49.9	31.71	269.1		
513	MBX	1	513	AMG GLC 63 S 4MATIC Coupe (Std. Air-Susp.)	4	M177-40DETC-S	L-9	1		63.5	63.5	113.1	I		N		49.9	31.71	269.1		
401	MBX	1	401	GLE 350	R	M276-35DEH	L-7	1		64.6	65.2	114.8	I		N		51.7	30.77	277.7		
402	MBX	1	402	GLE 350 4MATIC (ULEV)	4	M276-35DEH	L-7	1		64.6	65.2	114.8	I		N		51.7	30.77	277.7		
402	MBX	1	402	GLE 350 4MATIC (ULEV) (Air-Susp.)	4	M276-35DEH	L-7	1		65.2	65.9	114.8	I		N		52.3	30.47	280.5		
821	MBX	1	402	GLE 350 4MATIC (FFV)	4	M276-35F	L-7	1		64.6	65.2	114.8	I		N		51.7	30.77	277.7		
821	MBX	1	402	GLE 350 4MATIC (FFV) (Air-Susp.)	4	M276-35F	L-7	1		65.2	65.9	114.8	I		N		52.3	30.47	280.5		
270	MBX	1	270	AMG GLE 43 4MATIC	4	M276-30DETC-S	L-9	1		64.6	65.2	114.8	I		N		51.7	30.77	277.7		
270	MBX	1	270	AMG GLE 43 4MATIC (Air-Susp.)	4	M276-30DETC-S	L-9	1		65.1	65.9	114.8	I		N		52.2	30.52	280.1		
333	MBX	1	333	GLE 550 e 4MATIC	4	M276-30HP	L-7	1		64.6	65.2	114.8	I		N		51.7	30.77	277.7		
333	MBX	1	333	GLE 550 e 4MATIC (Air-Susp.)	4	M276-30HP	L-7	1		65.1	65.9	114.8	I		N		52.2	30.52	280.1		
406	MBX	1	406	AMG GLE 63 (Std. Air-Susp.)	4	M157-55DETC	L-7	1		66.4	67.1	114.8	I		N		53.3	29.98	285.3		
272	MBX	1	272	AMG GLE 63 S (Std. Air-Susp.)	4	M157-55DETC	L-7	1		66.4	67.1	114.8	I		N		53.3	29.98	285.3		
271	MBX	1	271	AMG GLE 43 4MATIC Coupe (Std. Air-Susp.)	4	M276-30DETC-S	L-9	1		65.1	65.9	114.8	I		N		52.2	30.52	280.1		
274	MBX	1	274	AMG GLE 63 S Coupe (Std. Air-Susp.)	4	M157-55DETC	L-7	1		65.2	67.1	114.8	I		N		52.8	30.22	282.9		
421	MBX	1	421	GLS 450 4MATIC (Std. Air-Susp.)	4	M276-30DETC-S	L-9	1		64.8	65.6	121.1	I		N		54.8	29.27	292.4		
423	MBX	1	423	GLS 550 4MATIC (Std. Air-Susp.)	4	M278-46DETC	L-9	1		66.0	66.8	121.1	I		N		55.8	28.82	297.2		
424	MBX	1	424	AMG GLS 63 (Std. Air-Susp.)	4	M157-55DETC	L-7	1		66.0	66.8	121.1	I		N		55.8	28.82	297.2		
435	MBX	1	435	G 550	4	M176-E40DETC	L-7	1		59.6	59.6	112.2	I		N		46.4	33.72	252.5		
436	MBX	1	436	G 550 4x4/2	4	M176-E40DETC	L-7	1		59.6	59.6	112.2	I		N		46.4	33.72	252.5		
440	MBX	1	440	AMG G 63	4	M157-55DETC	L-7	1		59.1	59.1	112.2	I		N		46.0	33.96	250.6		
441	MBX	1	441	AMG G 65	4	M279-60TC	L-7	1		58.3	58.3	112.2	I		N		45.4	34.34	247.7		
411	MBX	1	411	Metris (Cargo Van)	R	M274-20DETC-C	L-7	1		65.6	64.8	126.0	I		N		57.0	28.30	302.9		
410	MBX	1	410	Metris (Passenger Van)	R	M274-20DETC-C	L-7	1		65.6	64.8	126.0	I		N		57.0	28.30	302.9		

Model Year	2018
Comp Cat	LT
Prod Vol	-
Weighted	-
UnRnd Wgt Avg	-
Rnd Wgt Avg	-
Min PV Dom	-
Rnd Std	-
Prod Vol	-
Weighted	-
UnRnd Std	-
Rnd Std	-
Prod Vol	[]
Weighted	[]
UnRnd Std	30.92444612
Rnd Std	30.9
Prod Vol	[]
Weighted	[]
UnRnd Std	276.2388618
Rnd Std	276
Prod Vol	0
Weighted	0
UnRnd Wgt Avg	-
Rnd Wgt Avg	-
x 1.25	-
Rnd Std	-