

VOLKSWAGEN
GROUP OF AMERICA

RECEIVED

EXECUTIVE SECRETARIAT
2018 AUG 30 P 4: 12

VIA FEDEX
Ms. Heidi King
Deputy Administrator
National Highway Traffic Safety
Administration
1200 New Jersey Avenue SE
Washington, D.C. 20590

Thomas Zorn Name
Sr. Director Title
Safety Affairs and Advanced Research Department
248-754-6480 Phone
248-754-4511 Fax
Thomas.zorn@vw.com e-mail

28 August 2018 Date

Re: PETITION FOR TEMPORARY EXEMPTION FROM FMVSS 111
Supplemental submission

VOLKSWAGEN GROUP OF AMERICA, INC.
3800 HAMLIN ROAD
AUBURN HILLS, MI 48326
PHONE +1 248 754 5000

Dear Ms. King:

On August 3, 2018, Audi of America and its parent company, AUDI AG (hereinafter jointly referred to as "Audi"), submitted a petition for temporary exemption pursuant to 49 CFR Part 555.6(b), seeking an exemption from portions of Federal Motor Vehicle Safety Standard (FMVSS) 111 "Rear Visibility" in order to facilitate the development and field evaluation of a new motor vehicle safety feature, namely the replacement of the traditional external rearview mirrors with cameras and monitors [camera mirror system (CMS)] to provide the driver with excellent field of view to the sides and rear of the vehicle.

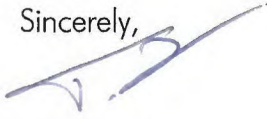
In the petition, Audi provided documentation that the CMS meets the *component* portion of the type approval under ECE Reg. 46. Audi further stated that once documentation containing the ECE Reg. 46 type approval of the CMS *vehicle* portion was received, it would be submitted as a supplement to the petition.

It is my pleasure to provide you with TÜV Rheinland Group certification test report number 185LP0004-00, establishing full homologation of the Audi CMS with the vehicle portion of the requirements set forth under ECE Reg. 46.

Please note that due to the confidential nature of the report, a request for confidential treatment has been submitted to the Office of Chief Counsel, a copy of which has been enclosed for your files.

Please do not hesitate to contact me at 248-754-6480 if further information is desired.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas Zorn', written over a horizontal line.

Thomas Zorn
Senior Director
Safety Affairs & Advanced Research



GRAND-DUCHÉ DE LUXEMBOURG

Ministère du Développement durable
et des Infrastructures

Département des Transports

L-2938 Luxembourg

SOCIÉTÉ NATIONALE DE
CERTIFICATION ET D'HOMOLOGATION

s.à r.l.

Registre de Commerce: B 27180

L-5201 Sandweiler



Référence: E13*46R04/04*9836*00

Annexes: - Rapport Technique
- Fiche de Renseignements du constructeur

Luxembourg, le 13 août 2018



COMMUNICATION

concernant 2/:
concerning 2/:

DELIVRANCE D'UNE HOMOLOGATION

APPROVAL GRANTED

EXTENSION D'HOMOLOGATION

APPROVAL EXTENDED

REFUS D'HOMOLOGATION

APPROVAL REFUSED

RETRAIT D'HOMOLOGATION

APPROVAL WITHDRAWN

ARRET DEFINITIF DE LA PRODUCTION

PRODUCTION DEFINITELY DISCONTINUED

d'un type de système de vision indirecte en application du Règlement N° 46
of a type of device for indirect vision pursuant to Regulation No. 46


Numéro d'homologation:

Approval number:

E13*46R04/04*9836*00

Marque d'homologation:

Approval mark:

III  049836

- 1. Marque déposée du dispositif:**
Trade name or mark of device: FICOSA International S.A.
- 2. Dénomination du type de dispositif attribuée par le fabricant:**
Manufacturer's name for the type of device: CLASS III
- 3. Nom et adresse du fabricant:**
Manufacturer's name and address: Ficosa International S.A
Gran Via Carlos III, 98, 5th
E-08028 Barcelona (Spain)

- 3.1 **Nom et adresse de l'atelier/des ateliers de montage:**
Name(s) and address(es) of assembly plant(s): not applicable
4. **Nom et adresse du mandataire du fabricant (s'il y a lieu):**
If applicable, name and address of manufacturer's representative: not applicable
5. **Soumis à l'homologation le:**
Submitted for approval on: 09.03. to 13.08.2018
6. **Autorité déléguée:**
Assigned authority: *Société Nationale de Certification et d'Homologation L-5201 Sandweiler*
- Service technique chargé des essais d'homologation:**
Technical service responsible for conducting approval tests: TÜV Rheinland Luxemburg GmbH
2a, Kalchesbruck
L-1852 Luxembourg
7. **Date du procès-verbal d'essai:**
Date of report issued by that service: 13.08.2018
8. **Numéro du procès-verbal d'essai:**
Number of report issued by that service: 185LP0004-00
9. **Description sommaire:**
Identification du dispositif: ~~rétroviseur~~, système à camera et moniteur, autre système 2/:
Système de vision indirecte de la classe I, II, III, ~~IV, V, VI, VII, S~~ 2/:
Symbole \triangle selon le paragraphe 6.1.3.1.1. du présent Règlement: ~~oui~~ / non 2/
Brief description:
Identification of the device: ~~mirror~~, camera/monitor, other device 2/: camera / monitor
Device for indirect vision of Class I, II, III, ~~IV, V, VI, VII, S~~ 2/: III
Symbol \triangle defined in paragraph 6.1.3.1.1. of this Regulation: ~~yes~~ / no 2/: no
10. **Emplacement de la marque d'homologation:**
Position of the approval mark: on a plate injection-moulded in the camera arm refer to manufacturer's information document
11. **Motif(s) de l'extension d'homologation (s'il y a lieu):**
Reason(s) for extension (if applicable): not applicable
12. **L'homologation est**
Approval: accordée / refusée / étendue / retirée 2/
granted / refused / extended / withdrawn 2/

13. **Lieu:**
Place: Luxembourg

14. **Date:**
Date: 13 août 2018

15. **Signature:**
Signature:

Pour le Ministre du Développement durable
et des Infrastructures

Pour la SNCH



Marco FELTES
Inspecteur Principal 1^{er} en rang



Laurent LINDEN
Attaché de Direction



16. **Est annexée la liste des pièces constituant le dossier d'homologation déposé au service administratif ayant délivré l'homologation, qui peuvent être obtenues sur demande:**
The list of documents deposited with the Administrative Service which has granted approval is annexed to this communication and may be obtained on request:

see "Index to type-approval report"

2/ Rayer la mention inutile
Delete where inapplicable



GRAND-DUCHÉ DE LUXEMBOURG

Ministère du Développement durable
et des Infrastructures

Département des Transports

L-2938 Luxembourg

SOCIÉTÉ NATIONALE DE
CERTIFICATION ET D'HOMOLOGATION

s.à r.l.

Registre de Commerce: B 27180

L-5201 Sandweiler



Référence: E13*46R04/04*9836*00

Annexes: - Rapport Technique
- Fiche de Renseignements du constructeur

Luxembourg, le 13 août 2018

Index du dossier d'homologation

Index to type-approval report

	Numéro d'homologation: Approval number:	E13*46R04/04*9836*00
	Révision: Revision:	00
	Marque de fabrique ou de commerce: Trade name or mark:	FICOSA International S.A.
	Type: Type:	CLASS III
1.	Procès-verbal d'essai: Test report:	N° 185LP0004-00
	- Test report:	Pages 1 to 7;
	- List of modifications:	Appendix 0 - Page 8;
	- Results of impact tests:	Appendix 1 - Page 9;
	- Test results:	Appendix 2 - Test report 60150800-002 - Page 1 to 76;
		Appendix 3 - Test report 21287866_004 - Page 1 to 16
	- Technical information:	Appendix L - Page 1 & 2.
2.	Dossier du constructeur: Report of the manufacturer:	N° 092-BEVQ6-V7_CMS-Information-Document
	- Information folder:	Pages 1, 2 & 3.
	- Annexes:	Pages 1, 2, 3 & 4.
3.	Autres documents annexés: Other documents annexed:	not applicable
4.	Date de délivrance de l'homologation initiale: Date of issue of initial type approval:	13.08.2018
5.	Date de la dernière délivrance de pages révisées: Date of last issue of revised pages:	not applicable
6.	Date de la dernière délivrance d'une homologation révisée: Date of last extension:	not applicable