KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Ave, NW
Suite 200
Washington, D.C. 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Jacqueline Glassman
Partner
Direct Dial: +1 202 626 9228
Direct Fax: +1 202 626 3737
jglassman@kslaw.com

Via Overnight Mail

November 7, 2019

Acting Administrator
James C. Owens
National Highway Traffic Safety
Administration 1200 New Jersey Avenue, S.E.
West Building, 41-304
Washington, D.C. 20590

Re: Petition for a Determination of Inconsequential Noncompliance
Mercedes-Benz, FMVSS 201

Dear Administrator Owens:

Pursuant to 49 U.S.C. § 30118(d) and 49 C.F.R. Part 556, Mercedes-Benz AG and Mercedes-Benz USA, LLC (collectively, "Mercedes-Benz"), submit the attached petition for a determination of inconsequential noncompliance with requirements related to the operation of interior compartment doors in FMVSS 201. In a small number of model year 2019 AMG vehicles, the interior compartment door located in the center console may open briefly and automatically close in certain types of forward crashes. The performance of the door does not create an enhanced risk to safety because the location of the door and the manner in which the door operates precludes the possibility of any injury to occupants. Consequently, Mercedes-Benz requests that the agency relieve it from the notice and remedy requirements of the Safety Act.

Please contact me with any questions.

Enclosures

Sincerely,

Jacqueline Glassman

ES19-003919

Petition for Inconsequential Noncompliance of Mercedes-Benz

Mercedes-Benz AG ("MB AG") and Mercedes-Benz USA, LLC ("MBUSA") (collectively, "Mercedes-Benz") submit this petition for inconsequential noncompliance pursuant to the Vehicle Safety Act, 49 U.S.C. § 30118(d) and 49 U.S.C. § 30120(h) and the related regulations at 49 C.F.R. Part 556.[1] Mercedes-Benz requests the agency grant its petition exempting it from the notice and remedy requirements of the Vehicle Safety Act on the ground that the noncompliance described below is inconsequential to motor vehicle safety.

At issue in this petition are a total of 12 Model Year 2019 Mercedes-Benz AMG GT vehicles. MB AG previously determined that the interior compartment door located within the vehicle's center console does not fully meet the requirement in FMVSS 201, Occupant Protection in Interior Impact, when tested to the demonstration procedure for frontal crash set forth in the standard. In a frontal crash scenario, there is a possibility for the lid of the interior compartment door in the center console to open for a matter of milliseconds, after which the door will automatically close again.

Due to the location and geometry of the compartment door, there is no risk of injury even if it were to open in a frontal crash. The door is located in the center console, below the in-vehicle display, and does not present an opportunity to strike vehicle occupants when opened. Further, because the design of the door is that it slides forward and into the center console when it opens, there is similarly no risk of injury from the performance of the door. Finally, although the purpose and objective of the standard is to protect against injury from hard and sharp surfaces in the event of a crash, because the compartment door will automatically close within an extremely short period of time (a matter of milliseconds) from opening and because the door may only open during a frontal crash in which case any objects within the compartment would only move in a forward direction and not rearward into the occupant compartment, there is no risk of harm from objects inside the compartment escaping into the occupant space.

I. Background

Pursuant to FMVSS 201, S5.3, "each interior compartment door assembly located in an instrument panel, [or] console assembly…shall remain closed when tested in accordance with either S5.3.1(a) and S5.3.1(b) or S5.3.1(a) and S5.3.1(c)."

The procedure located at S5.3.1 describes the process by which compliance is to be demonstrated.

> S5.3.1 Demonstration procedures.
>
> (a) Subject the interior compartment door latch system to an inertia load of 10g in a horizontal transverse direction and an inertia load of 10g in a vertical direction in accordance with the procedure described in section 5 of SAE Recommended Practice J839b (1965) (incorporated by reference, see §571.5), or an approved equivalent.

[1] Mercedes-Benz AG, formerly known as Daimler AG, is located in and organized under the laws of Germany. MBUSA is located at 1 Mercedes-Benz Dr, Sandy Springs, GA 30328. MBUSA is a limited liability company organized under the laws of Delaware.

(b) Impact the vehicle perpendicularly into a fixed collision barrier at a forward longitudinal velocity of 48 kilometers per hour.

(c) Subject the interior compartment door latch system to a horizontal inertia load of 30g in a longitudinal direction in accordance with the procedure described in section 5 of SAE Recommended Practice J839b (1965) (incorporated by reference, see §571.5), or an approved equivalent.

For the demonstration procedure selected by MB AG, S5.3.1(a) and S5.3.1(c), the latching system on each interior compartment door is to be subjected to a horizontal and inertia load of 10g in the vertical direction and a horizontal inertia load of 30g in a longitudinal direction. *See* S5.3.1(a) and (c).

Prior to the introduction of the MY 2019 AMG GT vehicles to the United States market, MB AG found that the lid of the front center console could open for a matter of a milliseconds and that the supplier of the compartment had tested the locking mechanism of the door with 24g of force, instead of the 30g force requirement contained in subparagraph (c) above. The crash lock was updated in production, prior to introduction to the U.S. market, to ensure conformance to the force requirements in subparagraph (c) and vehicles in the company's possession were reworked.[2] MB AG later identified 12 vehicles that had not received the improved crash lock mechanism prior to being released into the field and made a determination to submit a Part 573 Noncompliance Information Report on October 11, 2019. (See Attachment, Copy of 18V-752).

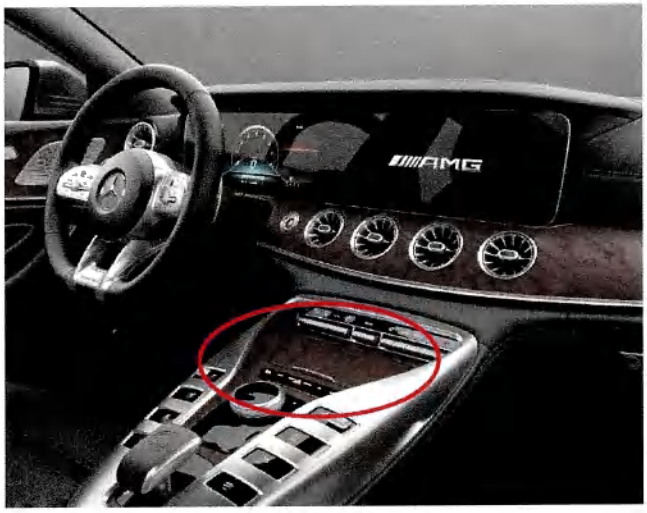
II. The Performance of the Compartment Door Does Not Create an Increased Safety Risk

Manufacturers may be exempted from the notification and remedy provisions of the Safety Act if NHTSA determines that the noncompliance is inconsequential to motor vehicle safety. 49 U.S.C. §§ 30118(d) and 30120(h). The basis upon which NHTSA evaluates an inconsequentiality petition is "whether an occupant who is affected by the noncompliance is likely to be exposed to a *significantly greater risk* than an occupant in a compliant vehicle." *See* 69 Fed. Reg. 19897, 19900 (April 14, 2004) (emphasis added). As described below, the issue here does not impact the operational safety of the vehicle and will not create an enhanced risk to vehicle occupants because in the limited, frontal crash scenario in which the door could potentially open, neither the door itself nor any objects within the compartment could cause injury to vehicle occupants.

Description of the Compartment Door

The interior compartment door at issue in this petition is a storage compartment used in vehicles with the Wireless Media Interface (WMI) package. The WMI feature allows users to wirelessly charge cell phones within the compartment and the compartment can also be used to store small objects like coins and accessories. The compartment is located within the center console between the driver and front passenger's seat and the storage portion of the compartment is approximately 15 cm/ 6 inches long and 13 cm/ 5 inches deep. (See Graphic A, below).

[2] The crash lock mechanism is not installed on vehicles offered for sale outside of the United States, Canada and South Korea, where FMVSS 201 or its equivalent has been adopted. MB AG is not aware of any claims or reports of injuries due to the performance of the interior compartment door in any market.



(Graphic A – Location of the Center Console Door in the AMG GT Vehicles)

In normal use, the door remains shut until an occupant pushes the door forward. The door moves forward in an upward direction, towards the front of the vehicle. When reaching the top, the door is enclosed within the housing of the compartment itself and, with an additional push is snapped into place to remain open. Once it is snapped into place, in order to close the door an occupant can pull the door slightly from the housing. The door then closes automatically. As a result, if the door does open briefly during a frontal crash and is not pushed fully into the latched open position, it will quickly and automatically close.

It is Not Possible for the Compartment Door to Strike Occupants

The performance of the interior compartment door does not present any of the safety risks contemplated by FMVSS 201 because there is no risk of vehicle occupants coming into contact with or striking the compartment door. When originally promulgated, the interior compartment door provisions in FMVSS 201 were focused on preventing injuries that could occur from hard interior doors, such as the glove compartment door, striking an occupant. *See* 33 Fed. Reg. 15794 (October 24, 1968) (considering "the potential injury that can be caused by an open interior compartment door because… [prior requirements] do not afford protection against the type of *protrusion created by an open interior compartment door*") (emphasis added); s*ee also Letter to M. Smith,* August 26, 1988 ("the purpose of the requirement is to prevent a door from flying open and striking an occupant in a crash.") The standard, which was also promulgated at a time when seat belt use was substantially lower than it is today, was directed toward mitigating injuries that can be caused by interior doors with hard and sharp surfaces opening unexpectedly. That risk is not present here.

The location, geometry and operation of the compartment door prevents it from causing or contributing to an injury in the event of a crash. The door is located in the bottom of the center console, in the area between the driver and front passenger seats. As indicated in the graphic below, the door is installed in a location where it could not strike a vehicle occupant should it open in a crash. The door, moreover, does not have any sharp edges and is not comprised of a hard, metal surface.

Further, because of the manner in which the door opens, there is no opportunity for the door to strike a vehicle occupant. The door covering slides forwards and into the housing of the

compartment itself, it does not extend outwards into the passenger compartment which is the concern that the standard is intended to address. In typical use, the operator slides the door covering away towards the front of the vehicle, away from the occupant compartment and into the center console where it becomes fully enclosed within the housing. By contrast, glove box doors and other interior compartment doors on hinges that open outwards and into the occupant compartment are the traditional types of doors that FMVSS 201 was designed to address because the door's surface could come into contact with a vehicle occupant if it opened in a crash. This same risk does not exist with the door covering in the AMG vehicles based on its geometry and design. (See Graphic B below).

(Graphic B – Image of the Console Door Fully Opened and Inside the Console Housing)

Additionally, the compartment door will automatically close after opening if it has not been snapped into place to stay open. In the event of a frontal crash force that is severe enough to cause the door to open, the door would open for an extremely short period of time -- a matter of milliseconds -- and then would automatically pull back into place and the door will close again. Because of the design and operation of the door, it remains open for a matter of milliseconds seconds after which it will retreat back into its fully closed position.

There is No Risk of Injury to Occupants from Objects Escaping the Compartment

Finally, there is no potential for items inside the storage compartment to escape and injure vehicle occupants. Although the scope of the standard has always been focused on risks of injury presented by the hard surface of vehicle doors opening in a crash, there is similarly no enhanced risk to safety from items escaping the compartment and causing injury. The compartment door has the potential to open only in specific situations, a frontal crash with loads exceeding 24g of force. The compartment door operates within the requirements of the standard at all other times.[3] Even in a crash where the load force was severe enough, the compartment lid would open and completely close again all within approximately 250 ms of the crash. Further, even in a front end crash that was severe enough to open the compartment door, the direction of the crash forces precludes objects from escaping. In a front end collision with high vehicle deceleration, any objects inside the storage compartment at the time would shift forward, in the same direction in which the vehicle is moving. Because the force of deceleration causes the items shift forward, they will move forwards and deeper into the compartment and will remain enclosed within the compartment during the crash event. During the intervening moments

[3] The vehicles fully meet the performance requirements when tested to S5.3.1(a) and S5.3.1(b).

following the crash, the door will automatically close and secure the items within the compartment.

III. Conclusion

The above described marking discrepancy does not create a safety risk. Mercedes-Benz is not aware of any warranty claims, field reports, customer complaints, legal claims, or injuries related to this noncompliance. Even if the compartment door were to open in the event of a severe crash, there is no increased risk of injury due to the location of the door covering itself, its operation and design that allows it to retract into the console housing and the fact that it will automatically close shut after an extremely short period of time. Vehicle occupants are not at risk of coming in to contact with the door itself (when opened or closed) and there is no risk of objects stored inside the compartment from escaping into the occupant space. Based on the lack of increased safety risk even with the non-compliance, Mercedes-Benz respectfully requests that the agency grant this petition.

safercar.gov
U.S. Department of Transportation

Mercedes-Benz USA, LLC.

Vehicle Report

NHTSA ID: 19V752 Transaction ID: 19-00855-23434-10 (Original Report)

Required fields indicated with *

Manufacturer: Mercedes-Benz USA, LLC.

13470 International Parkway
Jacksonville FL 32218

Bibi Analil
741-9608,

This is a Noncompliance Report. Filing a petition pursuant to 49 CFR 556

Vehicle Information

Mercedes-Benz GT53 AMG Four-Door 2019

* **Model Yr. Start:** 2019
* **Model Yr. End:** 2019
* **Make:** Mercedes-Benz
* **Model:** GT53 AMG Four-Door

Production Dates Begin: 08/29/2017
End: 03/04/2019

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
290.661 7X6B 1 Vehicle The recall population was determined through production records. Vehicles outside the recall population contain a crashlock mechanism in the lid of the front center console storage compartment that meets the requirements of FMVSS 201.5.3.1c

VIN Range(s): Begin: WDD7X6BBXKA001123 End: WDD7X8KB9KA002842

Mercedes-Benz GT63 AMG Four-Door 2019

* **Model Yr. Start:** 2019
* **Model Yr. End:** 2019
* **Make:** Mercedes-Benz
* **Model:** GT63 AMG Four-Door

Production Dates Begin: 08/29/2017
End: 03/04/2019

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
290.688 7X8J 4 Vehicles The recall population was determined through production records. Vehicles outside the recall population contain a crashlock mechanism in the lid of the front center console storage compartment that meets the requirements of FMVSS 201.5.3.1c

VIN Range(s): Begin: WDD7X6BBXKA001123 End: WDD7X8KB9KA002842

Mercedes-Benz GT63S AMG Four-Door 2019

* **Model Yr. Start:** 2019
* **Model Yr. End:** 2019
* **Make:** Mercedes-Benz
* **Model:** GT63S AMG Four-Door

Production Dates Begin: 08/29/2017
End: 03/04/2019

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
290.689 7X8K 7 Vehicles The recall population was determined through production records. Vehicles outside the recall population contain a crashlock mechanism in the lid of the front center console storage compartment that meets the requirements of FMVSS 201.5.3.1c

VIN Range(s): Begin: WDD7X6BBXKA001123 End: WDD7X8KB9KA002842

Number potentially involved: 12 **Estimated percentage of involved with defect:** 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

* **Describe the defect or noncompliance:**
Daimler AG ("DAG"), the manufacturer of Mercedes-Benz vehicles, has determined that on certain Model Year ("MY") 2019 AMG GT-Class 4-door coupe vehicles (290 platform), the front center console storage compartment might not meet the requirements of FMVSS 201 5.3.1c "that interior compartment doors remain closed" when subjected to specified forces.

If a noncompliance, provide the applicable FMVSS:
201 - Occupant protection in interior impact

If applicable, provide any further FMVSS affected:

Describe the cause:
Due to a deviation in production at the supplier, the lid of the front center console storage compartment might not meet the requirements of FMVSS201 5.3.1c regarding frontal impact.

* **Describe the safety risk:**
In the event of high deceleration forces during a frontal crash, the front center console storage compartment sliding lid might open inadvertently for a matter of milliseconds, but the compartment lid will immediately close again, preventing any objects contained inside the compartment from entering the passenger compartment. DAG intends to submit a petition for inconsequential noncompliance pursuant to 49 C.F.R. Part 556

Identify any warning which can precede or occur:

This Recall affects all vehicles.

If applicable, identify the manufacturer of the defective or noncompliant component. If the manufacturer of the component is unknown, provide the information for the company that supplied the subject component.

Component manufacturer

Company Information

Company Name: FUNK DREIDIMENSIONAL Entwicklungs- und V
Country: Germany

Company Contact Information

First Name: Michael
Last Name: Braun
Position: Manager Design / Development

Address 1:	Forchenbusch 11	**Email:**	michael.braun@funk3d.com
Address 2:		**Phone:**	1491736552319
City:	Simmersfeld		
State:	FOREIGN STATES		
Zip/Postal Code:	72226		

Chronology of Defect / Noncompliance Determination

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:
In November 2018, before the introduction of this vehicle model to the U.S. market, a sled test (FMVSS-201 5.3.1c), during vehicle development showed that the lid of the front centerconsole storage compartment had opened for matter of milliseconds. Subsequently, analyses regarding the root cause for this condition were initiated. It was concluded that the crashlock mechanism of the lid did not meet production specifications due to deviations in the development process at a supplier. In December 2018, a technical solution to improve the crashlock mechanism for the lid was introduced into series production and vehicles in DAG's possession were reworked. The vehicle model was introduced to the U.S. market in May 2019. At that point in time, the available information indicated that all vehicles potentially affected from this issue had already been reworked with the improved crashlock mechanism. In July 2019, after a review of rework documentation, it was found that a number of vehicles might have been released to the market without first undergoing the rework on the crashlock mechanism. Over the next several months, DAG carried out additional investigation and analysis to confirm whether vehicles without the rework were in fact released to the field and, if so, how the compartment door would perform in a crash and whether there was an actual risk of objects exiting the compartment in the event of a crash. On October 11, 2019, DAG determined that a non-compliance with FMVSS201 can not be ruled out, however, due to the geometrical design and the manner in which the compartment lid operates, as well as the fact the lid might be open inadvertently only for a matter of milliseconds and will immediately close again, preventing any objects contained inside the compartment from entering the passenger compartment, DAG intends to submit a petition for inconsequential noncompliance.

Identify the Remedy

Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.
MBUSA intends to submit a petition for inconsequential treatment pursuant to 49 C.F.R. Part 556 because the inadvertent opening of the center console lid does not create a safety risk. Inadvertent momentary opening of the sliding lid does not pose a safety risk. As such, DAG intends to submit a petition for inconsequential noncompliance.

Describe what distinguishes the remedy component from the recalled component.
Vehicles outside the recall population contain a crashlock mechanism in the lid of the front center console storage compartment that meets the requirements of FMVSS 201.

Identify and describe how and when the recall condition was corrected in production.
A change in the crashlock mechanism of the lid of the front center console storage compartment ensures that this issue can no longer occur from Mar 05, 2019 onwards.

Identify the Recall Schedule

Describe the recall schedule for notifications.:
Dealers will be notified of the pending voluntary recall campaign on October 25, 2019. A copy of all communications will be provided when available.

Planned Dealer Notification Begin Date: 10/25/2019
Planned Dealer Notification End Date:
Planned Owner Notification Begin Date:
Planned Owner Notification End Date:

Manufacturer's identification code for this recall (if applicable):

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

Manufacturer Comments to NHTSA Staff

DAG intends to submit a petition for inconsequential treatment pursuant to 49 C.F.R. Part 556. For any questions, please contact Gregory Gunther at gregory.gunther@mbusa.com

Document Upload

There are 0 documents associated with this report.

Part 573 Safety Recall Report 19V-752

Manufacturer Name : Mercedes-Benz USA, LLC.
Submission Date : OCT 18, 2019
NHTSA Recall No. : 19V-752
Manufacturer Recall No. : NR

Manufacturer Information :

Manufacturer Name : Mercedes-Benz USA, LLC.
Address : 13470 International Parkway
Jacksonville FL 32218
Company phone : 1-877-496-3691

Population :

Number of potentially involved : 12
Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2019-2019 Mercedes-Benz GT63 AMG Four-Door
Vehicle Type : LIGHT VEHICLES
Body Style : 4-DOOR
Power Train : GAS
Descriptive Information : 290.688 7X8J 4 Vehicles
The recall population was determined through production records. Vehicles outside the recall population contain a crashlock mechanism in the lid of the front center console storage compartment that meets the requirements of FMVSS 201.5.3.1c
Production Dates : AUG 29, 2017 - MAR 04, 2019
VIN Range 1 : Begin : WDD7X6BBXKA001123 End : WDD7X8KB9KA002842 ☑ Not sequential

Vehicle 2 : 2019-2019 Mercedes-Benz GT53 AMG Four-Door
Vehicle Type : LIGHT VEHICLES
Body Style : 4-DOOR
Power Train : GAS
Descriptive Information : 290.661 7X6B 1 Vehicle
The recall population was determined through production records. Vehicles outside the recall population contain a crashlock mechanism in the lid of the front center console storage compartment that meets the requirements of FMVSS 201.5.3.1c
Production Dates : AUG 29, 2017 - MAR 04, 2019
VIN Range 1 : Begin : WDD7X6BBXKA001123 End : WDD7X8KB9KA002842 ☑ Not sequential

Vehicle 3 : 2019-2019 Mercedes-Benz GT63S AMG Four-Door
Vehicle Type : LIGHT VEHICLES
Body Style : 4-DOOR
Power Train : GAS
Descriptive Information : 290.689 7X8K 7 Vehicles
The recall population was determined through production records. Vehicles outside

the recall population contain a crashlock mechanism in the lid of the front center console storage compartment that meets the requirements of FMVSS 201.5.3.1c

Production Dates : AUG 29, 2017 - MAR 04, 2019

VIN Range 1 : Begin : WDD7X6BBXKA001123 End : WDD7X8KB9KA002842 ☑ Not sequential

Description of Noncompliance :

Description of the Noncompliance :	Daimler AG ("DAG"), the manufacturer of Mercedes-Benz vehicles, has determined that on certain Model Year ("MY") 2019 AMG GT-Class 4-door coupe vehicles (290 platform), the front center console storage compartment might not meet the requirements of FMVSS 201 5.3.1c "that interior compartment doors remain closed" when subjected to specified forces.
FMVSS 1 :	201 - Occupant protection in interior impact
FMVSS 2 :	NR
Description of the Safety Risk :	In the event of high deceleration forces during a frontal crash, the front center console storage compartment sliding lid might open inadvertently for a matter of milliseconds, but the compartment lid will immediately close again, preventing any objects contained inside the compartment from entering the passenger compartment. DAG intends to submit a petition for inconsequential noncompliance pursuant to 49 C.F.R. Part 556
Description of the Cause :	Due to a deviation in production at the supplier, the lid of the front center console storage compartment might not meet the requirements of FMVSS201 5.3.1c regarding frontal impact.
Identification of Any Warning that can Occur :	NR

Supplier Identification :

Component Manufacturer

Name : FUNK DREIDIMENSIONAL Entwicklungs- und V

Address : Forchenbusch 11
Simmersfeld FOREIGN STATES 72226

Country : Germany

Chronology :

In November 2018, before the introduction of this vehicle model to the U.S. market, a sled test (FMVSS-201 5.3.1c), during vehicle development showed that the lid of the front centerconsole storage compartment had opened for matter of milliseconds. Subsequently, analyses regarding the root cause for this condition were initiated. It was concluded that the crashlock mechanism of the lid did not meet production specifications due

to deviations in the development process at a supplier.

In December 2018, a technical solution to improve the crashlock mechanism for the lid was introduced into series production and vehicles in DAG's possession were reworked.

The vehicle model was introduced to the U.S. market in May 2019. At that point in time, the available information indicated that all vehicles potentially affected from this issue had already been reworked with the improved crashlock mechanism.

In July 2019, after a review of rework documentation, it was found that a number of vehicles might have been released to the market without first undergoing the rework on the crashlock mechanism. Over the next several months, DAG carried out additional investigation and analysis to confirm whether vehicles without the rework were in fact released to the field and, if so, how the compartment door would perform in a crash and whether there was an actual risk of objects exiting the compartment in the event of a crash.

On October 11, 2019, DAG determined that a non-compliance with FMVSS201 can not be ruled out, however, due to the geometrical design and the manner in which the compartment lid operates, as well as the fact the lid might be open inadvertently only for a matter of milliseconds and will immediately close again, preventing any objects contained inside the compartment from entering the passenger compartment, DAG intends to submit a petition for inconsequential noncompliance.

Description of Remedy :

Description of Remedy Program :	MBUSA intends to submit a petition for inconsequential treatment pursuant to 49 C.F.R. Part 556 because the inadvertent opening of the center console lid does not create a safety risk. Inadvertent momentary opening of the sliding lid does not pose a safety risk. As such, DAG intends to submit a petition for inconsequential noncompliance.
How Remedy Component Differs from Recalled Component :	Vehicles outside the recall population contain a crashlock mechanism in the lid of the front center console storage compartment that meets the requirements of FMVSS 201.
Identify How/When Recall Condition was Corrected in Production :	A change in the crashlock mechanism of the lid of the front center console storage compartment ensures that this issue can no longer occur from Mar 05, 2019 onwards.

Recall Schedule :

Description of Recall Schedule :	Dealers will be notified of the pending voluntary recall campaign on October 25, 2019. A copy of all communications will be provided when available.

Planned Dealer Notification Date :	OCT 25, 2019 - NR
Planned Owner Notification Date :	NR - NR

* NR - Not Reported