

From: gregory.gunther@mbusa.com
To: [Mazurowski, Robert \(NHTSA\)](#)
Cc: Daniel.Selke@mbusa.com; david.tait@mbusa.com; bibi.analil@mbusa.com; [Chodrow, Brian \(NHTSA\)](#)
Subject: RE: Petition to NHTSA for Import Eligibility of 2017-2019 Mercedes Benz Maybach S600 Pullman
Date: Wednesday, December 11, 2019 2:48:14 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hello Mr. Mazurowski,

It is Mercedes-Benz's position that the S600 Pullman cannot be considered substantially similar to the Maybach S650, primarily because of mass (2820 kg vs 3600 kg), which translates to differences in crash tests, braking distance, and tire loads.

You are correct that Brabus is responsible for performing the modifications. As such, there is no documentation existing within MB-AG to indicate that the vehicles were tested for conformance to the FMVSS.

If we can assist further, please let me know.

Regards,

Gregory Gunther

Department Manager – Vehicle Compliance and Analysis

Mercedes-Benz USA
Engineering Services
13470 International Parkway
Jacksonville, FL 32218
Office: +1904-741-9607

From: Mazurowski, Robert (NHTSA) <robert.mazurowski@dot.gov>
Sent: Friday, December 06, 2019 3:07 PM
To: Gunther, Gregory (171) <gregory.gunther@mbusa.com>
Cc: Selke, Daniel (171) <Daniel.Selke@mbusa.com>; Tait, David (171) <david.tait@mbusa.com>; Analil, Bibi (171) <bibi.analil@mbusa.com>; Chodrow, Brian (NHTSA) <Brian.Chodrow@dot.gov>
Subject: RE: Petition to NHTSA for Import Eligibility of 2017-2019 Mercedes Benz Maybach S600 Pullman

Mr. Gunther,

That would be most helpful!

Again, thank you for your time and assistance,



Robert Mazurowski
Automotive Engineer
Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE., Washington, DC 20590
Office: 202-366-1012

From: gregory.gunther@mbusa.com [<mailto:gregory.gunther@mbusa.com>]
Sent: Friday, December 06, 2019 2:59 PM
To: Mazurowski, Robert (NHTSA) <robert.mazurowski@dot.gov>
Cc: Daniel.Selke@mbusa.com; david.tait@mbusa.com; bibi.analil@mbusa.com; Chodrow, Brian (NHTSA) <Brian.Chodrow@dot.gov>
Subject: RE: Petition to NHTSA for Import Eligibility of 2017-2019 Mercedes Benz Maybach S600 Pullman

Hello Mr. Mazurowski,

Confirming receipt of your request.

Please allow us until end of next week to reply to your request.

Regards,

Gregory Gunther

Department Manager – Vehicle Compliance and Analysis

Mercedes-Benz USA
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Jacksonville, FL 32218
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From: Mazurowski, Robert (NHTSA) <robert.mazurowski@dot.gov>
Sent: Friday, December 06, 2019 2:35 PM
To: Gunther, Gregory (171) <gregory.gunther@mbusa.com>
Cc: Selke, Daniel (171) <Daniel.Selke@mbusa.com>; Tait, David (171) <david.tait@mbusa.com>; Analil, Bibi (171) <bibi.analil@mbusa.com>; Chodrow, Brian (NHTSA) <Brian.Chodrow@dot.gov>
Subject: Petition to NHTSA for Import Eligibility of 2017-2019 Mercedes Benz Maybach S600 Pullman

Mr. Gunther,

The National Highway Traffic Safety Administration (NHTSA) has been petitioned by a registered importer to allow importation of model years (MY) 2017 through 2019 Mercedes Benz Maybach S600 Pullman passenger cars (limousines). It appears there is no version of this vehicle originally manufactured for sale in the United States (US) and therefore the petitioner has submitted a petition

for import eligibility on the basis the candidate vehicle is substantially similar to another vehicle already manufactured for the US market and/or is readily capable of being modified to meet all Federal Motor Vehicle Safety Standard (FMVSS) requirements. The comparison vehicle originally manufactured for the U.S. market (U.S. companion model) the petitioner cites as being substantially similar is the MY 2017 to 2019 Mercedes Benz Maybach S600 (sedan, not limo). It is the agency's understanding that while the Pullman version of this vehicle in question is based on the sedan version of the S600 the Pullman version may actually be modified or manufactured by Brabus. Can you assist in determining the validity of the claimed comparison made by the petitioner that the Pullman version will (or will not) meet all FMVSS requirements based solely on the fact that the US companion sedan does. If not, can you direct me to the correct entity within the Daimler or Mercedes Benz organization? I can provide portions of the petitioner's submission if that would be helpful.

Thank you,



Robert Mazurowski
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