



VIA ELECTRONIC SUBMISSION

October 29, 2020

Docket Management Facility
U.S Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

RE: NHTSA-IIHS AEB MOU Commitment Letter (Docket# NHTSA-2015-0101)

The attached report is submitted to fulfill the requirements to the Automobile Industry Commitment to Implement Automatic Emergency Braking Technology. MBUSA independently and voluntarily commits to make AEB technology as standard equipment and conforming to Sections 1. A and 1.B the commitment. The report indicates that MBUSA met the requirements for light duty vehicles and trucks 8500 lbs GVWR or less with 97% U.S. market production compliant vehicles during the production period September 1, 2019- August 31, 2020.

Should you have any questions, please do not hesitate to contact Bibi Analil, of my staff, at bibi.analil@mbusa.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Gunther', is located below the 'Sincerely,' text.

Gregory Gunther
Department Manager
Vehicle Compliance & Analysis

Cc: Nat Beuse (NHTSA)
David Zuby (IIHS)

Enclosure

Mercedes-Benz USA, LLC A Daimler Company

One Mercedes-Benz Drive Sandy Springs, GA 30328 770.705.0600

Annual report of the proportion of vehicles that conform to the specifications of the Commitment to Advancing Automatic Emergency Braking Technology

Docket ID: NHTSA–2015–0101

For vehicles manufactured after September 1, 2019, and before August 31, 2020, and to be sold in the United States, please report the following:

	Number of vehicles in each category	Number or proportion of those sold conforming with sections 1.A and 1.B of the Commitment to Advancing Automatic Emergency Braking Technology
Light duty vehicles and trucks 8,500 lb. GVWR and less	365,325	97%
Vehicles manufactured as police or emergency services vehicles, if electing to exempt them from applicability	N/A	
Vehicles with manual transmissions if electing to delay their conformance with the commitment	N/A	
Light duty vehicles and trucks between 8,501-10,000 lb. GVWR	23,777	0%
Vehicles manufactured as police or emergency services vehicles, if electing to exempt them from applicability	N/A	