



GENERAL MOTORS LLC
Global Vehicle Safety

USG 5004
January 14, 2021

Otto G. Matheke III, Director
Office of Vehicle Safety Compliance
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Regarding:

Docket No. NHTSA-2020-0107

Petition for Decision That Nonconforming Model Year 2014–2018 Chevrolet Cheyenne Trucks are Eligible for Importation

Docket No. NHTSA-2020-0108

Petition for Decision that Nonconforming Model Year 2014-2018 Chevrolet 2500 Trucks are Eligible for Importation

Diversified Vehicle Services Inc. Petitions to Import Cheyenne/Silverado Pick-up Trucks from Mexico.

Dear Mr. Matheke,

General Motors LLC (GM) submits the following comments regarding the two petitions submitted by Diversified Vehicle Services Inc. with the National Highway Traffic Safety Administration.

GM does not recommend that these vehicles be granted eligibility for importation into the United States. The owners of these vehicles will find it very difficult or impossible to get safety-critical repairs in the US.

One example demonstrating GM's reasoning is that GM vehicles contain highly sophisticated electronic modules which are programmed on the assembly line. If the vehicle needs a calibration update, the technician will plug the GM Multiple Diagnostic Interface (MDI) tool into the onboard diagnostics (OBD) port and type in the VIN. If the vehicle was manufactured for sale in Mexico the VIN will not be recognized by the MDI tool used at a US GM dealership. GM dealers in the US are only authorized to service US-designated vehicles under the terms of their existing franchise agreements.





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Under the National Traffic and Motor Vehicle Safety Act, the registered importer would be the “manufacturer” of these vehicles and would be responsible for safety-recall related responsibilities under the Act. It is unclear whether the registered importer(s) in question have the capabilities to discharge these obligations.

If you have questions regarding the attached information, please contact me or Matthew Jerinsky at the General Motors Washington office.

Sincerely,

John A. Magdaleno, Senior Manager
Safety Regulations and Certification

