



USG 4963
August 12, 2020

Mr. Robert Mazurowski
Automotive Engineer
U.S Department of Transportation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Information Request Regarding Vehicles Imported by a Registered Importer

Dear Mr. Mazurowski,

This is in response to your inquires regarding the importation of eight General Motors trucks imported from Mexico.

Vehicle	VIN
CK15543-2015 CHEYENNE CREW CAB 4X4	3GCUK9EJ4FG388808
CK15543-2015 CHEYENNE CREW CAB 4X4	3GCUK9EJ5FG338290
CC15703-2015 CHEVROLET SILVERADO	3GCNC9EC1FG192828
CK15543-2015 CHEYENNE CREW CAB 4X4	3GCUK9EC3FG395038
CK15543-2015 CHEYENNE CREW CAB 4X4	3GCUK9EC6FG327672
CK15543-2015 CHEYENNE CREW CAB 4X4	3GCUK9EC8FG326586
CK15703-2015 CHEYENNE REGULAR CAB 4X4	1GCNK9EC0FZ202705
CK15543-2015 CHEYENNE CREW CAB 4X4	3GCUK9EC6FG345864

GM Mexico manufacturers vehicles in Mexico for Mexico, Central America and South America markets. These are economy/entry level vehicles that are not eligible for importation into the US. In general, vehicles engineered in the US for the US market and also sold in Mexico have the same safety content as their US counterpart. This would include the full-size pick-up trucks.

There are some options for pick-up trucks in Mexico that would not be allowed in the US. A good example is the tire pressure monitoring system (TPMS). TPMS is optional in Mexico and any vehicle without TPMS would have to be retrofitted for importation to the US in order to comply with FMVSS 138. There is also an engine and manual transmission combination not available in the US and we have no documentation that demonstrates compliance to FMVSS 102, 114, and 124. As manufactured, all the vehicles listed above have US engine transmission combinations, TPMS and an emission system that complies with US Federal emission regulations. Attached to this letter is a detailed list of regular production options (RPOs) describing the option content of each vehicle.





The pick-up trucks listed above have all the safety content found in a US vehicle. However, there are compliance issues due to the use of metric units versus English and the use of Spanish labeling and ISO symbols instead of English. FMVSS 101, 110, 135 and 208 require English wording either by itself or supplemental to an ISO symbol.

Below is a summary of FMVSS non-compliance for the vehicles listed above.

FMVSS 101

The instrument cluster may or may not comply with FMVSS 101. For the US, the instrument cluster must be English predominant, using miles per hour for vehicle speed and miles for the odometer instead of kilometers per hour and kilometers. Some clusters can be “switched” by the driver to use English or metric units. FMVSS 101 allows for metric units to be used in the instrument cluster but the odometer must be labeled as kilometers. If not labeled, FMVSS 101 assumes the odometer is in miles.

FMVSS 101/135

The malfunction telltale must use the word “BRAKE” either alone or in combination with the ISO symbol used in Canada, Mexico and other export countries.



BRAKE

Metric

English

**Canada, Mexico
and other Export**

US Vehicles

Note that retrofitting a Mexican instrument cluster with a US version will correct this and the odometer issue noted for FMVSS 101 previously.





FMVSS 135

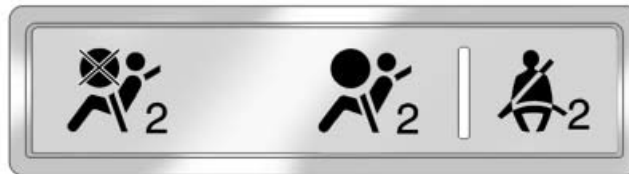


Spanish/Arabic Brake Fluid Warning Label

This label is installed on or near the brake fluid reservoir. If it obscures the English language wording molded into the brake fluid reservoir, it should be removed.

FMVSS 208

The passenger airbag telltale does not comply with FMVSS 208. Different symbols are used depending if English or metric:



Canada and Mexico With a Passenger Sensing System



United States with a Passenger Sensing System

This telltale is located in overhead console and will need to be retrofitted.





The visor has ISO symbols instead of English words.



Mexico Label on Driver's Side Only



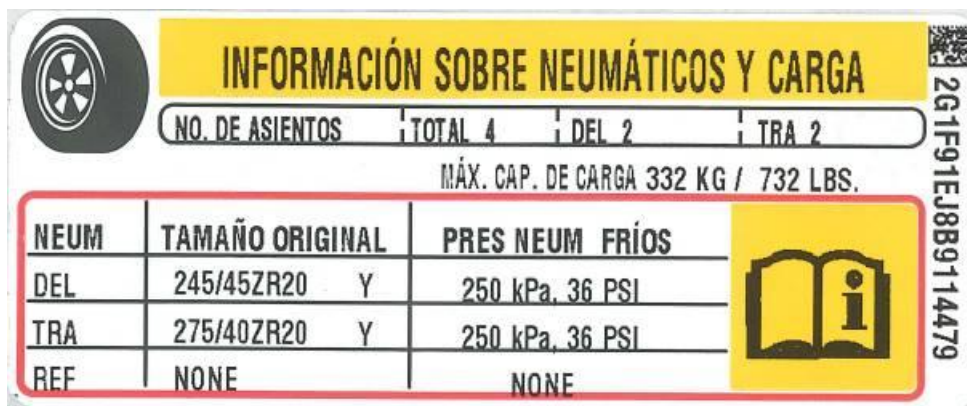
Label used on US and Canada Vehicles – Driver and Passenger

GM uses this label in the US and Canada. The RI does not have to use a bi-lingual label and may be able to install one that is only in the English language if they can find a supplier. GM does not offer an “English only” label.



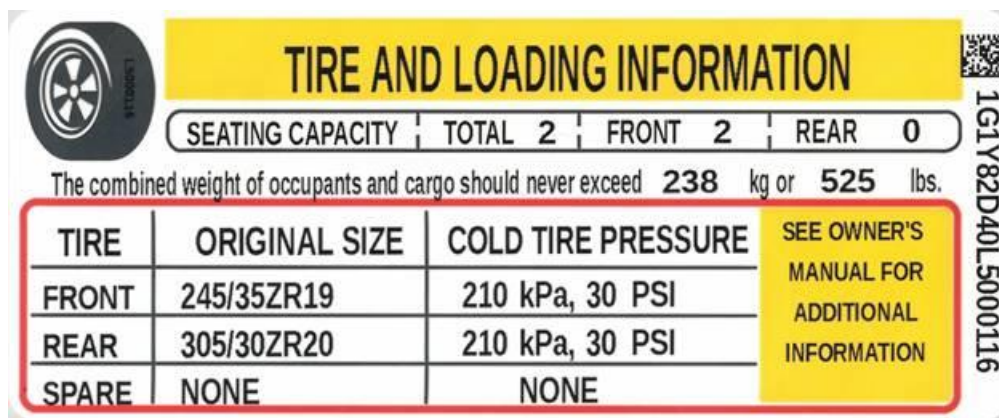
FMVSS 110

The tire placard looks like:



**Example of tire placard used in Mexico
(Values listed are not for any of the above vehicles)**

It will need to be changed to:



**Example of US tire placard
(Values listed are not for any of the above vehicles)**

Emission Label

Vehicles sold in Mexico do not have an underhood emission label. These vehicles have the same emission content as a US vehicle and an emission label with the correct certification number needs to be installed.





FMVSS 138 (TPMS) and Tire Regulations FMVSS 110 and 139

Since these vehicles are used and have probably had at least one change of tires, GM cannot determine if the replacement tires comply with FMVSS 138 and all relevant tire regulations. In summary:

- The tires must have the “DOT” symbol molded into the sidewall of the tire. Most replacement tires in Mexico do not comply with FMVSS 139. The tires will need to be replaced.
- The replacement tires must have adequate load carrying capabilities suited for the vehicle. Overrated tires should not be an issue, but if the tires are underrated it could present a dangerous overloading condition.
- Replacement tires may have a different recommended cold tire inflation pressure than the original tires installed on the vehicle. The replacement placard may have different values than the original label.
- Any change in tire pressure may require that the TPMS be recalibrated so that the triggering threshold used to activate the TPMS low tire pressure telltale complies with the requirements in FMVSS 138.
- If accessories were added that increased the weight of the vehicle the tires may need to be upgraded to handle the extra weight. This would also require a change to the vehicle capacity weight information found on the tire placard required by FMVSS 110.

Other Considerations

Any part replaced due to normal wear and tear such as brake pads need to comply with FMVSS standards. Any part replaced due to a collision such as vehicle lighting, air bags, etc. must also comply with FMVSS standards.

If you have any questions regarding this information, please contact Jeff Upchurch of this office, Matthew Jerinsky of our Washington, DC office or me.

Sincerely,

John A. Magdaleno, Senior Manager
Safety Regulations and Certification

Attachment



Key:

Content Necessary for US Compliance

Mexico Unique Content

Mexico Import Vehicle Option Content		2015							
		Chevrolet Pick-up Trucks							
		VIN							
RPO	REGULAR PRODUCTION OPTION (RPO) DESCRIPTION	3 G C U K 9 E J 4 F G 3 8 8 8 0 8	3 G C U K 9 E J 5 F G 3 3 8 8 2 9 0	3 G C N C 9 E C 1 F G 1 9 2 8 2 2 8	3 G C U K 9 E C 3 9 5 0 3 8	3 G C U K 9 E C 6 F G 3 2 7 6 7 8	3 G C U K 9 E C 8 F G 3 2 6 5 8 0	1 G C N K 9 E C 0 F Z 2 0 7 0	3 G C U K 9 E C 6 F G 3 4 5 8 6 4
AL0 ¹	SENSOR INDICATOR INFLATABLE RESTRAINT, FRT PAS	X	X	X	X	X	X	X	X
AN3	SEAT FRT, INDIVIDUAL (NON BKT)	X	X		X				X
AQQ	LOCK CONTROL, ENTRY REMOTE ENTRY, EXTENDED R	X	X		X	X	X		X
AU3	LOCK CONTROL SIDE DR, ELEC	X	X	X	X	X	X	X	X
AXK	VEHICLE TYPE TRUCK	X	X	X	X	X	X	X	X
AY0 ²	RESTRAINT SYSTEM SEAT, INFLATABLE, DRIVER & PAS	X	X	X	X	X	X	X	X
B30	COVERING FLOOR CARPET	X	X		X				
B32	COVERING FRT FLOOR MATS, AUX				X				X
B33	COVERING REAR FLOOR MATS, AUX				X				X
B58	COVERING FLOOR MAT, FRT & RR, CARPETED INSERT	X	X						
B85	MOLDING B/S EXTERIOR, BRIGHT	X	X		X				X
BG9	COVERING FLOOR RUBBER			X		X	X	X	
BTV	REMOTE START ENGINE	X	X		X				X
BVQ	STEPS, RUNNINGBOARD SIDE, TUBULAR, CHROME	X	X		X				X
BWN	STEPS CORNER ASSIST, BUMPER	X	X	X	X	X	X	X	X
C49	DEFOGGER RR WINDOW, ELECTRIC	X	X		X				X
C5S	GVW RATING 6, 600 LBS			X					
C5U	GVW RATING 6, 800 LBS							X	
C5Z	GVW RATING 7, 200 LBS	X	X		X	X	X		X
C67	HVAC SYSTEM AIR CONDITIONER FRT, ELECTRONIC			X		X	X	X	
CF5	ROOF SUN, GLASS, SLIDING, ELEC	X	X		X				X
CGN	LINER PUBX, SPRAY ON	X	X		X				X
CJ2	HVAC SYSTEM AIR CONDITIONER FRT, AUTO TEMP CON	X	X		X				X
CV3	COUNTRY MEXICO	X	X	X	X	X	X	X	X
D07	CONSOLE FRT COMPT, FLOOR, CUSTOM	X	X		X				X
DD8	MIRROR I/S R/V LT SENSITIVE	X	X		X				X
DE2	MIRROR O/S LH & RH, MANUAL CONTROL, FOLDING			X		X	X	X	
DH6	MIRROR I/S FRT VAN LH & RH, SUNSHADE, ILLUM	X	X		X				X

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DL3	MIRROR O/S LH & RH, REMOTE CONTROL, ELECTRIC, H	X	X		X				X
DNS	EQUIPMENT SUPPLIER INSTALLED	X	X		X				X
DP9	MIRROR PROVISIONS HOUSING, CHROME	X	X		X				X
E20	HANDLE O/S DOOR CHROME	X	X		X				X
E63	BODY EQUIPMENT FLEETSIDE PICK-UP BOX	X	X	X	X	X	X	X	X
EXP	EXPORT	X	X	X	X	X	X	X	X
FE9	CERTIFICATION EMISSION, FEDERAL	X	X	X	X	X	X	X	X
FHO	VEHICLE FUEL GASOLINE E10	X	X						
FHS	VEHICLE FUEL GASOLINE E85			X	X	X	X	X	X
FLT	SALES PROCESSING OPTION					X	X	X	
FWI	PLANT CODE FT WAYNE, IN, USA							X	
G80	AXLE POSITRACTION LIMITED SLIP	X	X		X				X
GAJ	APPEARANCE PACKAGE HIGH COUNTRY	X	X						
GAN	PRIMARY COLOR EXTERIOR, SWITCHBLADE SILVER								X
GAZ	PRIMARY COLOR EXTERIOR, SUMMIT WHITE			X		X	X	X	
GBA	PRIMARY COLOR EXTERIOR, BLACK		X						
GBN	PRIMARY COLOR EXTERIOR, WHITE DIAMOND TRICOAT	X			X				
GU4	AXLE REAR 3.08 RATIO			X		X	X	X	
GU5	AXLE REAR 3.23 RATIO	X	X						
GU6	AXLE REAR 3.42 RATIO				X				X
H2R	INTERIOR TRIM CONFIG CLOTH, LEVEL 1, JET BLACK			X		X	X	X	
H2U	INTERIOR TRIM CONFIG LEATHER, LEVEL 3, JET BLACK				X				X
H4S	INTERIOR TRIM CONFIG LEATHER, LEVEL 3, MINK	X	X						
I15	ENGINEERING YEAR 2015	X	X	X	X	X	X	X	X
IO3	RADIO INFOTAINMENT SYSTEM - BASE HMI			X		X	X	X	
IO6	RADIO INFOTAINMENT SYSTEM - UPLEVEL HMI,	X	X		X				X
JD9	BRAKE VAC POWER, 17" DISC/DISC, W/VSES, 7700 LBS	X	X	X	X	X	X	X	X
JF4	PEDALS ADJUSTABLE, POWER	X	X		X				X

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K34	CRUISE CONTROL AUTOMATIC, ELECTRONIC	X	X	X	X	X	X	X	X
K47	AIR CLEANER HIGH CAPACITY	X	X						
KA1	HEATER SEAT, FRT				X				X
KB6	HEATER SEAT, COOLING, FRT	X	X						
KC4	COOLING SYSTEM ENG OIL	X	X	X	X	X	X	X	X
KG4	GENERATOR 150 AMP	X	X	X	X	X	X	X	X
KI4	RECEPTACLE ELECTRICAL, ACCESSORY 110 VOLT	X	X		X	X	X		X
KNP	COOLING SYSTEM TRANS, HD	X	X	X	X	X	X	X	X
L83	ENGINE GAS, 8 CYL, 5.3L, SIDI VVT, AFM, E85 MAX			X	X	X	X	X	X
L86	ENGINE GAS, 8 CYL, 6.2L, SIDI VVT, AFM, E85 MAX, ALUM	X	X						
M5U	TRANSMISSION AUTO 8 SPD, 8L90	X	X						
MCX	MARKETING AREA MEXICO	X	X	X	X	X	X	X	X
MSL	PLANT CODE SILAO, MEXICO	X	X	X	X	X	X		X
MYC	TRANSMISSION AUTO 6 SPD, HMD, 6L80			X	X	X	X	X	X
N33	STEERING COLUMN TILT TYPE			X		X	X	X	
N37	STEERING COLUMN TILT, TELESCOPING	X	X		X				X
NKC	NOISE CONTROL SYSTEM, ACTIVE NOISE CANCELLATIO	X	X						
NK5	STEERING WHEEL STANDARD			X		X	X	X	
NP5	STEERING WHEEL LEATHER WRAPPED	X	X						X
NQG	TRANSFER CASE MANUAL SHIFT CONT, TWO SPEED					X	X	X	
NQH	STEERING WHEEL LEATHER WRAPPED	X	X		X				X
NT7	EMISSION SYSTEM FEDERAL, TIER 2	X	X	X	X	X	X	X	X
NZJ	WHEEL 20 X 9.0, J, ALUMINUM, DESIGN 9	X	X						
NZZ	SALES PACKAGE SKID PLATE, "OFF ROAD" SPORT							X	
PPA	EQUIPMENT ASSIST, OPEN & CLOSE, TAILGATE	X	X	X	X	X	X	X	X
R5C	TIRE BRAND ALL BRIDGESTONE					X	X	X	
RBZ	TIRE ALL P255/70R17 SL 110S BW ALS					X	X	X	
RC4	TIRE SPARE P265/70R17 SL 113S BW	X	X		X				X

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		G	G	G	G	G	G	G	G
		C	C	C	C	C	C	C	C
		U	U	N	U	U	U	N	U
		K	K	C	K	K	K	K	K
		9	9	9	9	9	9	9	9
		E	E	E	E	E	E	E	E
		J	J	C	C	C	C	C	C
		4	5	1	3	6	8	0	6
		F	F	F	F	F	F	F	F
		G	G	G	G	G	G	Z	G
		3	3	1	3	3	3	2	3
		8	3	9	9	2	2	0	4
		8	8	2	5	7	6	2	5
		8	2	8	0	6	5	7	8
		0	9	2	3	7	8	0	6
		8	0	8	8	2	6	5	4
RC5	TIRE ALL LT265/70R17 C 112Q BW AT			X					
RC7	TIRE ALL P275/55R20 SL 111S BW AT	X	X		X				X
RD2	WHEEL 20 X 9.0, J, ALUMINUM, DESIGN 2				X				X
RD6	WHEEL 17 X 8.0, J, STEEL, DESIGN 2			X				X	
RD7	WHEEL 17 X 8.0, J, STEEL, DESIGN 3					X	X		
RHM	TIRE SPARE LT265/70R17 C 112Q BW AT			X					
RUF	WHEEL SPARE 17 X 7.5, J, STEEL, DESIGN 1	X	X	X	X	X	X	X	X
SAF	LOCK SPARE TIRE, HOIST SHAFT	X	X	X	X	X	X	X	X
SLT	EQUIPMENT 'LT' SALES PKG	X	X		X				X
T2H ³	ORNAMENTATION EXTR, EXPORT UNIQUE REQUIREME	X	X	X	X	X	X	X	X
T3U	LAMP FRT FOG	X	X		X				X
TG5	PLAYER COMPACT DISC AND MP3			X		X	X	X	
U19	SPEEDOMETER INST, KILO & MILES, KILO ODOMETER	X	X	X	X	X	X	X	X
U2J	DIGITAL AUDIO SYSTEM S-BAND - NONE	X	X	X	X	X	X	X	X
U42	ENTERTAINMENT PKG REAR SEAT, SINGLE DISPLAY, RE	X	X		X				X
U73	ANTENNA FIXED, RADIO	X	X	X	X	X		X	X
UD5	PARK ASSIST FRONT AND REAR	X	X						
UD7	PARK ASSIST REAR				X				X
UDC	DISPLAY INSTRUMENT DRIVER INFO ENHANCED			X		X	X	X	
UDD	DISPLAY INSTRUMENT DRIVER INFO ENHANCED (MULT	X	X		X				X
UE0	COMMUNICATION SYSTEM VEHICLE - NONE			X		X	X	X	
UE1	COMMUNICATION SYSTEM VEHICLE, ONSTAR	X	X		X				X
UEU	SENSOR INDICATOR FORWARD COLLISION ALERT								
UF2	LAMP CARGO	X	X		X				X
UG1	OPENER GARAGE DOOR, UNIVERSAL	X	X		X				X
UJM	TIRE PRESS INDICATOR MANUAL LEARN	X	X	X	X	X	X	X	X
UK3	CONTROL STEERING WHEEL, ACCESSORY	X	X		X				X
UQ3	SPEAKER SYSTEM ENHANCED AUDIO					X	X		

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		Chevrolet Pick-up Trucks							
		VIN							
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		G	G	G	G	G	G	G	G
		C	C	C	C	C	C	C	C
		U	U	N	U	U	U	N	U
		K	K	C	K	K	K	K	K
		9	9	9	9	9	9	9	9
		E	E	E	E	E	E	E	E
		J	J	C	C	C	C	C	C
		4	5	1	3	6	8	0	6
		F	F	F	F	F	F	F	F
		G	G	G	G	G	G	Z	G
		3	3	1	3	3	3	2	3
		8	3	9	9	2	2	0	4
		8	8	2	5	7	6	2	5
		8	2	8	0	6	5	7	8
		0	9	2	3	7	8	0	6
8	0	8	8	2	6	5	4		

Notes

- 1 Passenger Sensing System
- 2 2 Stage front air bags, side air bags and roof rail airbags necessary for FMVSS compliance
- 3 "Cheyenne" ornamentation