

DAIMLER

August 23, 2024

Christina Barnes
Senior DOT Compliance Specialist
Daimler Truck North America

Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Ave. SE
Washington, D.C. 20590-0001

Re: CDL Exemption

Daimler Truck North America LLC is respectfully submitting this request for an exemption of the CDL requirements per §381.310 for a software engineer who holds a valid German CDL and requires the ability to legally test drive various DTNA vehicles on public roads while working here in the U.S. This individual plays a crucial role in directing company resources in developing and testing of thermal management functions for electric trucks globally.

The information as required by the regulation is as follows:

- (b) Andreas Munch – Software Engineer Common Powertrain Controller for Thermal Management Functions
- (b1) Christina Barnes, Senior DOT Compliance Specialist
Daimler Truck North America
4555 N. Channel Avenue
Portland, OR 97217
503.745.5365
- (b2) Daimler Truck North America, LLC
- (b3) 4555 N. Channel Ave
Portland, OR 97217
- (b4) N/A
- (c1) Andreas Munch, a software engineer specializing in the common powertrain controller for thermal management functions, is seeking an exemption to legally test drive various DTNA vehicles on public roads while working in the U.S. Mr. Munch holds a German CDL and requires this exemption due to his critical role in developing software and thermal management systems for electric trucks.

Mr. Munch is responsible for developing and optimizing the software that controls and manages the thermal systems of the vehicle's powertrain. He will need to conduct engineering test drives to validate the thermal management systems in our electric trucks. These validations must be performed over long driving cycles that encompass mixed road gradients, varying eAxle and battery loads, and temperatures to ensure optimal vehicle performance and safety. Testing on public roads allows Mr. Munch to gather valuable insights into real-world traffic scenarios, aligning software applications with actual driver experiences and maintaining high standards of quality and efficiency. Effective thermal management is essential for regulating engine and component temperatures, as well as providing appropriate cabin

heating and cooling, ensuring both operational efficiency and occupant comfort. To ensure safety during these test drives, Mr. Munch will always be accompanied by a U.S. state DMV-issued CDL holder who is familiar with the designated test routes. Mr. Munch is unable to obtain a U.S. CDL due to his lack of residency and is requesting for an exemption for the maximum allowable duration of five years.

This exemption is imperative to meet our future vehicle development and electric truck launch goals.

- (c2) We are asking that FMCSA grant an exemption for this driver from the following sections of 49 CFR for the maximum allowable duration of five years:
- 49 CFR 383.23 – CDL Requirements
- (c3) The exemption is requested for this driver only. The vehicles driven would be various vehicles from the DTNA fleet.
- (c4) We believe granting this exemption would have no impact on safety of U.S. roadways.
- (c5) We believe that the requirements for obtaining a German CDL guarantee a level of safety equivalent to or surpassing that of a U.S. state DMV-issued CDL. Furthermore, Mr. Munch is an experienced driver who is familiar with the operation of commercial motor vehicles. Finally, to further ensure safety, Mr. Munch will always be accompanied by a U.S. state DMV-issued CDL holder that is well-acquainted with the designated routes to be traveled in case of unforeseen circumstance.
- (c6) If this exemption is not granted, we believe that the successful development and launch of future electric trucks and advanced safety systems could be hindered. This individual plays a crucial role in developing and implementing software solutions that optimize the thermal management of a vehicle's powertrain system. It is essential for Mr. Munch to legally drive DTNA vehicles on U.S. roads to gain a comprehensive understanding of product requirements for these systems in real-world environments within the U.S. market.
- (d) Please find a copy of Mr. Munch German CDL, driving history vom Kraftfahrt-Bundesamt, a statement of driving history and an agreement with the driver and Daimler on the following pages for your review.

Thank you very much for your attention to this time sensitive matter.

Best regards,

Christina Barnes

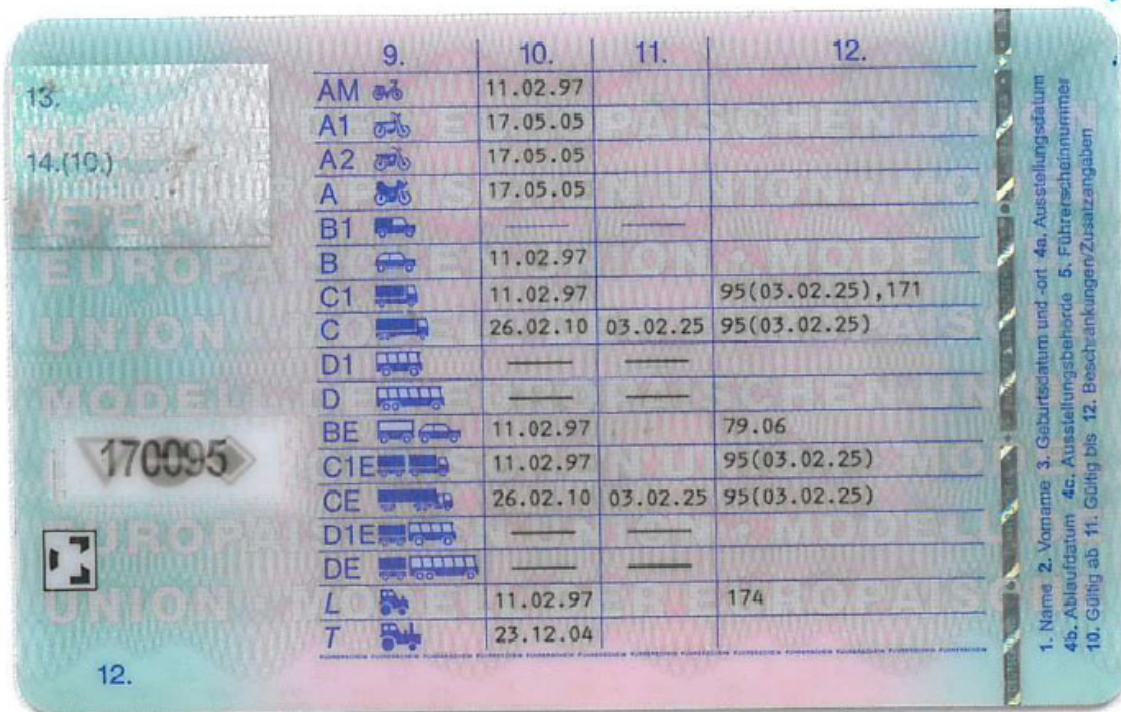
Christina Barnes
Sr. DOT Compliance Specialist
Daimler Truck North America LLC
503-745-5365

Proof of German Driver's License for Commerical Vehicle Operations

Front



Back



Kraftfahrt-Bundesamt • 24932 Flensburg • Germany

Mr.
ANDREAS MÜNCH
STRÜMPFELBACHER STRASSE 106
71384 WEINSTADT STADTTEIL EN...

Your reference / your letter of:

Our reference:
00-173-24-00467-25
Contact:
FAER Referat23
Phone: 0461 316-1550
Fax: 0461 316-2943
E-Mail: referat23@kba.de

Date: 21.06.2024

Information from the Register of Driver Fitness (FAER)

Dear Mr. MÜNCH,
using following data for the request:

Surname MÜNCH	Name at birth MÜNCH	
Given names ANDREAS	Place of birth WEINHEIM BERGSTRASSE	Date of birth 18.10.1978

at the time of the information there were no entries.

Yours sincerely



This information is valid without a signature.

FAER_VA/AnsreibenPrivatAuskunft_VA



elektronisch gesiegelt
von: Kraftfahrt-Bundesamt
am: 21.06.2024
um: 08:29:03 +02
Siegel nur im elektronischen Verfahren gültig

In accordance with the EU General Data Protection Regulation (GDPR), it is pointed out that the application data and the file number will be stored for a period of six months from the time the information is provided in case of any queries. The data will then be deleted. Further information regarding the processing of personal data by the KBA can be found at www.kba.de

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BIC: MARKDEF1200

TO
Christina Barnes
Senior DOT Compliance Specialist
Daimler Truck North America LLC
4555 North Channel Avenue
Portland, Oregon 97217

Statement from ANDREAS MUENCH stating:

Whether your CDL has been suspended or revoked: NO or YES

Whether you have been involved in an accident or crash in the past three years: NO or YES

Signature: 

Date: 2024/21/06

Name: ANDREAS MUENCH

DAIMLER

I, ANDREAS MUENCH, hereby acknowledge that anytime that I will be operating commercial motor vehicles in the United States of America it will be exclusively under the provision of Daimler Truck North America LLC and its affiliates.

ANDREAS MUENCH

Driver Name (Print)



Driver Signature

2024/21/06

Date

Christina Barnes

(Print)



DTNA DOT Compliance Specialist

8/23/2024

Date