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September 9, 2024

Administrator  
Federal Motor Carrier Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590-0001

Dear Administrator:

Re: CDL Exemption Extension for TRATON SE Senior Vice President, (Docket No. FMCSA–2018–0347)

Navistar, Inc. (“Navistar”) is respectfully submitting this request for a five-year exemption extension per §381.310 for TRATON’s Senior Vice President of the Cabin & Chassis Group who holds a German CDL and needs to participate in test driving events from our Lisle, Illinois facilities beginning this year. This individual will play a pivotal role in the development of new and advanced systems. An important part of developing these technologies will be test drive events. It will be necessary for him to be able to drive the test vehicles on US public roads to guide the team’s efforts.

The information as required by the regulation is as follows:

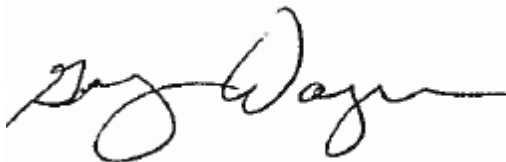
- (b) Thomas Nickels, Senior Vice President TRATON SE, Head of Group R&D Cabin & Chassis
- (b)(1) Gary Wagner  
Fleet Safety Manager  
Navistar, Inc.  
2701 Navistar Dr.  
Lisle, IL 60532  
331-332-4908
- (b)(2) Navistar, Inc.
- (b)(3) 2701 Navistar Dr.  
Lisle, IL 60532
- (b)(4) DOT# 162593
- (c)(1) Thomas Nickels is the Senior Vice President of the Cabin & Chassis R&D group for Navistar’s parent company, TRATON SE. He holds a German CDL and requires the ability to legally test drive various Navistar test fleet vehicles on public roads while in the US.

Mr. Nickels will be driving Class 6 trucks and Class 8 tractor trailers with Navistar's new integrated technologies occasionally between the approval date and approximately December 1, 2029. He will be driving no more than eight hours per day for two consecutive days. The driving will typically be evenly split between two lane state highways and interstate highways. The driving will consist of no more than 300 miles per day and in all cases a US state DMV issued CDL holder who is familiar with the applicable routes will accompany Mr. Nickels.

MAN is part of the TRATON Group that is Navistar's parent company and is a partner in developing Navistar's technology advancements. Navistar believes that the exemption extension for this driver is needed in order to successfully achieve these advancements in the near term. Mr. Nickels needs to be able to legally drive Navistar vehicles on US public roads to better understand product requirements for these systems in "real world" environments, and to verify that the technologies being developed meet or exceed expectations.

- (c)(2) We are asking that FMCSA grant a five-year exemption extension for this driver from the following section of 49 CFR for the maximum allowable duration of five years:
- 49 CFR 383.23 - CDL requirements
- (c)(3) This exemption extension is requested for Thomas Nickels only. The vehicles driven would be various Class 6 thru 8 development vehicles from the Navistar test fleet.
- (c)(4) We believe that granting this exemption would have no impact on safety of US roadways.
- (c)(5) We believe that the requirements for a German CDL are such that they ensure that the same level of safety is met or exceeded as if this driver had a US state DMV issued CDL. Furthermore, Mr. Nickels is familiar with the operation of Commercial Motor Vehicles ("CMV") worldwide and finally, a US state DMV issued CDL holder who is familiar with the FMCSA regulations as well as the specific routes to be driven, will always accompany Mr. Nickels when he is driving a CMV.
- (c)(6) If this exemption extension is not granted, we believe that the progress of developing advanced technologies, will be slowed. Thus, the availability of these advancements to the US market will be delayed. The availability of these advancements will benefit US fleet owners, drivers, and citizens by implementing advanced capability/safety technologies. As a critical technical member of the development team, Mr. Nickels needs to participate in "real world" vehicle tests on US roads to verify the evolution of this product and associated advancements in technology prior to going to market.
- (d) Attached please find a copy of Mr. Nickels German CDL, a CMV driving experience statement, and an accident statement.

Sincerely,



Gary Wagner  
Fleet Safety Manager  
Navistar, Inc.