

DAIMLER

Christina Barnes
Senior DOT Compliance Specialist
Daimler Truck North America

August 23, 2024

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 powertrain and thermodynamic systems for electric trucks globally.

The information as required by the regulation is as follows:

- (b) Christopher Kappes – Software Engineer Common Powertrain Controller for Powertrain Protection 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) Christopher Kappes, a software engineer specializing in the common powertrain controller for powertrain protection functions, is seeking an exemption to legally test drive various DTNA vehicles on public roads while working in the U.S. Mr. Kappes holds a German CDL and requires this exemption due to his critical role in software and thermodynamic system development for current and future electric trucks.

Mr. Kappes is responsible for software integration, development and parameter turning which will require engineering test drive validations. These validations must be conducted over extended driving cycles to effectively develop and implement software related to the powertrain and thermodynamic systems. Such rigorous testing is essential to ensure the vehicles' optimal performance, safety and regulatory compliance. Testing on public roads allows Mr. Kappes to gather valuable insights into real-world traffic scenarios, aligning software applications with actual driver experiences and maintaining high standards of quality and efficiency. To ensure safety during these test drives, Mr. Kappes will

always be accompanied by a U.S. state DMV-issued CDL holder who is familiar with the designated test routes. Mr. Kappes 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. Kappes is an experienced driver who is familiar with the operation of commercial motor vehicles. Finally, to further ensure safety, Mr. Kappes 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 that optimizes the interaction between software and hardware enhancing the performance, efficiency, and drivability of our powertrain and thermodynamic systems. It is essential for Mr. Kappes 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. Kappes 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

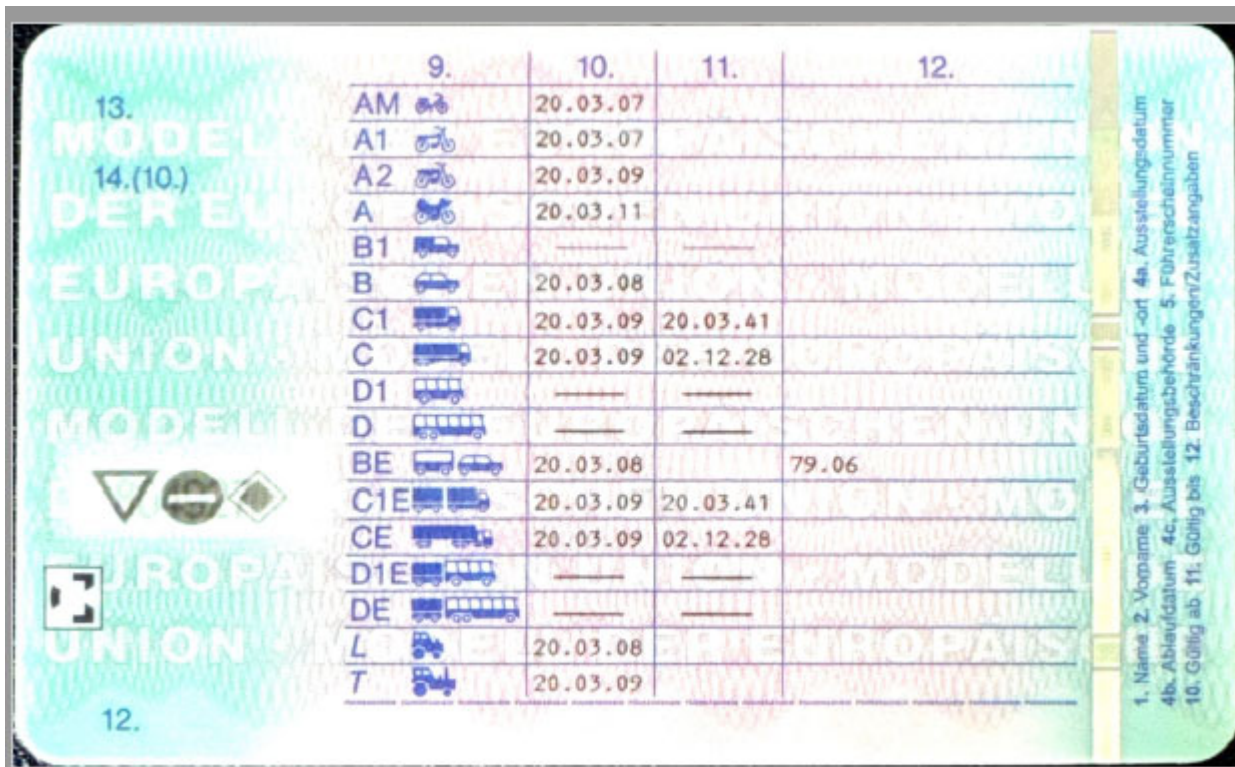
Christina Barnes
Sr. DOT Compliance Specialist
Daimler Truck North America LLC
503-745-5365

Proof of German Driver's License for Commerical Vehicle Operations

Front



Back



Mr.
CHRISTOPHER KAPPES
OFFENTHALER STRAÙE 8
63329 EGELSBACH

Your reference / your letter of:

Our reference:
00-183-24-01354-25
Contact:
FAER Referat23
Phone: 0461 316-1550
Fax: 0461 316-2943
E-Mail: referat23@kba.de

Date: 01.07.2024

Information from the Register of Driver Fitness (FAER)

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

Surname KAPPES	Name at birth KAPPES	
Given names CHRISTOPHER	Place of birth FRANKFURT AM MAIN	Date of birth 20.03.1991

at the time of the information there were no entries.

Yours sincerely



This information is valid without a signature.



elektronisch gesiegelt
von: Kraftfahrt-Bundesamt
am: 01.07.2024
um: 15:36:01 +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

TO

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

Statement from Christopher Kappes stating:

Whether your CDL has been suspended or revoked: NO

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

Signature: Christopher Kappes

Date: 2024-07-01

Name: Christopher Kappes

DAIMLER

I Christopher Kappes, 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.

Christopher Kappes

Driver Name (Print)

Christopher Kappes

Driver Signature

2024-07-01

Date

Christina Barnes

(Print)

Christina Barnes

DTNA DOT Compliance Specialist

8/23/2024

Date