

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 software development for the common powertrain controller that controls all the high voltage functions for electric trucks globally.

The information as required by the regulation is as follows:

- (b) Fabian Schab – Software Engineer High Voltage System and Common Powertrain Controller for High Voltage System
- (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) Fabian Schab is a software engineer specializing in the development of common powertrain controllers for high-voltage functions in electric trucks. He holds a German CDL and requires the ability to legally test drive various DTNA vehicles on public roads while working here in the U.S. This necessity arises from his responsibilities for developing and optimizing the control software that governs the high-voltage functions of an electric vehicle's powertrain.

Mr. Schab needs to conduct engineering test drives and software validations on public roads. These activities provide invaluable insights into the performance and functionality of our trucks in real-world traffic scenarios. Performing rigorous safety testing and validations is essential to ensure that the common powertrain controller handles high-voltage functions without causing any hazards. Given the complexity of electric trucks, which operate at high voltages, it is imperative to evaluate the software's ability to control power distribution, manage battery life, and maintain overall system performance under diverse driving condition. The driver, will in all cases, be accompanied by a U.S. state DMV-issued CDL holder

who is familiar with the routes to be traveled. Mr. Schab 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. Schab is an experienced driver who is familiar with the operation of commercial motor vehicles. Finally, to further ensure safety, Mr. Schab 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 the development of the common powertrain controllers that controls the high voltage functions in future electric vehicles. Mr. Schab needs to be able to legally drive DTNA vehicles on U.S. roads to better understand product requirements for these systems in “real world” environments in the U.S. market.
- (d) Please find a copy of Mr. Schab 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

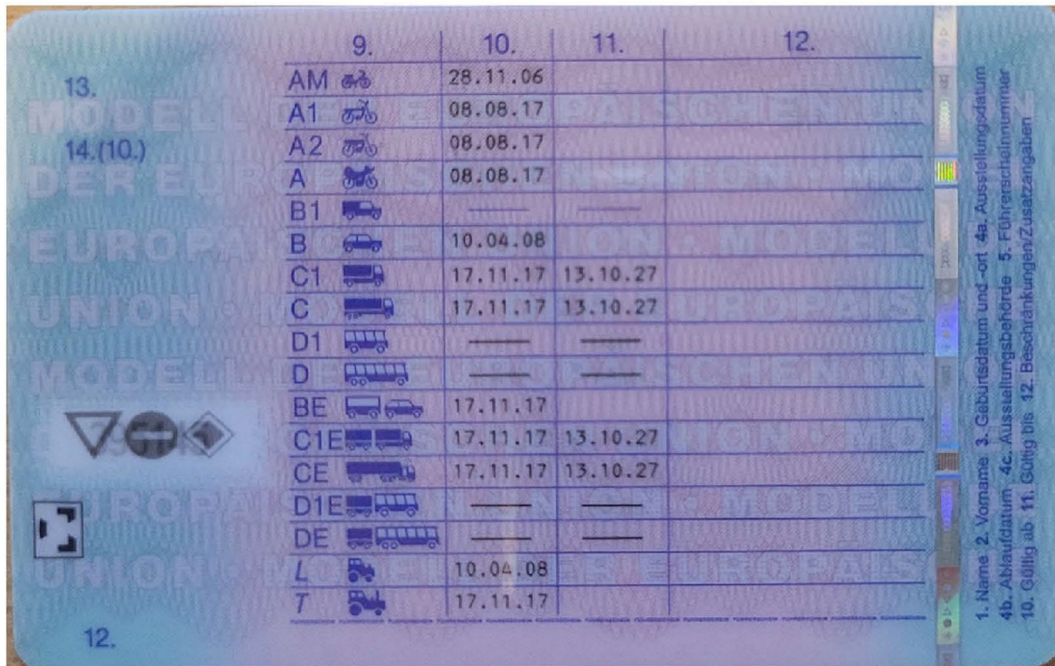
Christina Barnes
Sr. DOT Compliance Specialist
Daimler Truck North America LLC
503-745-5365

Proof of German Driver's License for Commerical Vehicle Operations

Front



Back



Kraftfahrt-Bundesamt • 24932 Flensburg • Germany

Mr.
FABIAN SCHAB
SCHNELLENSTRASSE 27
73770 DENKENDORF

Your reference / your letter of:

Our reference:
00-220-24-01527-25
Contact:
FAER Referat23
Phone: 0461 316-1550
Fax: 0461 316-2943
E-Mail: referat23@kba.de

Date: 07.08.2024

Information from the Register of Driver Fitness (FAER)

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

Surname SCHAB	Name at birth SCHAB	
Given names FABIAN	Place of birth OSTFILDERN	Date of birth 27.08.1990

at the time of the information there were no entries.

Yours sincerely



This information is valid without a signature.

FAER_VA/AnsreibenPrivatAuskunft_VA



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Kraftfahrt-Bundesamt
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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

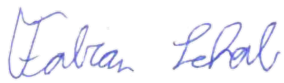
TO

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

Statement from Fabian Schab 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: 

Date: 2024-08-07

Name: Fabian Schab

DAIMLER

I Fabian Schab , 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.

Fabian Schab

Driver Name (Print)

Fabian Schab

Driver Signature

2024-08-07

Date

Christina Barnes

(Print)

Christina Barnes

DTNA DOT Compliance Specialist

8/23/2024

Date