



Mercedes-Benz

Mercedes-Benz USA, LLC
A Daimler Company

**CERTIFICATE IN SUPPORT OF
REQUEST FOR CONFIDENTIALITY**

I, R. Thomas Brunner, pursuant to the provisions of 49 CFR Part 512, state as follows:

(1) I am the Department Manager of Vehicle Compliance and Analysis for Mercedes-Benz USA, LLC (MBUSA), and I am authorized by MBUSA and its parent company, Daimler Aktiengesellschaft (DAG) to execute documents on their behalf;

(2) I certify that the information marked confidential and contained in MBUSA's February 24, 2017 response to NHTSA in PE16-016 is confidential and proprietary data. Therefore I submit that it is entitled to confidential treatment under 5 U.S.C § 552(b)(4);

(3) I hereby request that the information marked confidential be protected on an ongoing basis;

(4) This certification is based on the information provided by the responsible personnel who have authority in the normal course of business to release the information for which a claim of confidentiality has been made to ascertain whether such information has ever been released outside MBUSA or DAG;

(5) Based upon that information, and to the best of my knowledge, information and belief, the information for which MBUSA and DAG have claimed confidential treatment has never been released or become available outside of MBUSA or DAG, except as hereinafter specified: the information has been made available as necessary for the purpose of obtaining advice and assistance from counsel and other confidential advisors or in the course of confidential business relationships, such as supplier and affiliate relationships;

(6) I make no representations beyond those contained in this certificate and, in particular, I make no representations as to whether this information may become available outside of MBUSA or DAG, because of unauthorized or inadvertent disclosure except as stated in Paragraph 5; and

(7) I certify under penalty of perjury that the foregoing is true and correct.
Executed on this the 24 day of February, 2017.


R. Thomas Brunner

Mercedes-Benz USA, LLC
One Mercedes Drive
P.O. Box 350
Montvale, NJ 07645-0350
Phone (201) 573-0600
Fax (201) 573-0117
www.MBUSA.com

