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December 3, 2021

VIA ELECTRONIC FILING

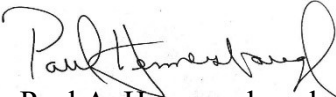
Gregory Magno
Chief, Vehicle Defects Division D
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20059

Re: Mercedes-Benz Response to Information Request Associated with PE21-020 Part II

Dear Chief Magno:

Attached is the final portion of Mercedes-Benz USA, LLC's ("MBUSA") and Mercedes-Benz AG's ("MBAG") (sometimes referred to collectively herein as "Mercedes-Benz" or "Respondent") Response to the NHTSA Information Request (IR) dated September 15, 2021 which is associated with PE21-020, pertaining to vehicles manufactured by Tesla Inc (the "Response Part"). This last segment of the Response provides additional narrative descriptions, information and materials on the remaining request, Request No. 7, propounded by the IR. Mercedes-Benz submitted its Responses to Requests 1-6 and 8-11 in its primary Response, on November 17, 2021. Mercedes-Benz has concurrently submitted a Confidentiality Request to NHTSA Office of Chief Counsel, designating Confidential information included in Mercedes-Benz's Response. Should you have questions regarding this submission, please contact me.

Sincerely,


Paul A. Hemmersbaugh

cc: Thomas Healy

**NHTSA PRELIMINARY EVALUATION 21-020:
AUTO-PILOT AND FIRST RESPONDER INCIDENT SCENE MANAGEMENT**

**MERCEDES-BENZ
RESPONSE TO INFORMATION REQUEST
PART II**

DECEMBER 3, 2021

MERCEDES-BENZ IR RESPONSE (PE21-020) PART II

Mercedes-Benz USA, LLC (“MBUSA”) and Mercedes-Benz AG (“MBAG”) (sometimes referred to collectively herein as “Mercedes-Benz” or “Respondent”) submit this final portion of their Response to the NHTSA Information Request (IR) dated September 15, 2021 which is associated with PE21-020, pertaining to vehicles manufactured by Tesla Inc (the “Response”). This last segment of the Response provides additional narrative descriptions, information and materials on the remaining request, Request No. 7, propounded by the IR. Mercedes-Benz submitted its Responses to Requests 1-6 and 8-11 in its primary Response, on November 17, 2021.

Mercedes-Benz reasserts and incorporates by reference as if set forth in full herein, preliminary matters addressed in their Response to NHTSA IR associated with PE21-020, submitted on November 17, 2021. This includes but is not limited to, Mercedes-Benz’ objections to certain terms, definitions, directions, and requests set forth in the IR associated with PE21-020. Unless otherwise indicated, documents cited herein are contained in the document collection submitted as part of this Response (“Mercedes-Benz IR Response Documents Part II (PE-21-20)”), in the folder that corresponds to the number of the Response.

Mercedes-Benz has concurrently submitted a Confidentiality Request to NHTSA’s Chief Counsel’s Office designating Confidential Business Information included in this Response (including responsive document).

Mercedes-Benz reserves all of its rights in connection with this matter. By expressly asserting or reiterating certain rights and objections here, Mercedes-Benz does not intend to waive any others, now or in the future.

SPECIFIC RESPONSES

Request No. 7:

For each trade name / trim level of the subject system available in the subject vehicles, describe all modifications or changes made by, or on behalf of, Mercedes-Benz in the design, material composition, manufacture, quality control, supply, function, or installation of the subject system, from the start of production to date, which relate to, or may relate to driver engagement / attentiveness and OEDR by the subject system in the subject vehicles. For each such modification or change, provide the following information:

- a. The date or approximate date on which the modification or change was incorporated into vehicle production;**
- b. A detailed description of the modification or change;**
- c. The reason(s) for the modification or change;**
- d. The hardware, firmware, and software names and numbers of the original version;**
- e. The hardware, firmware, and software names and numbers of the modified version;**
- f. Primary distribution method of related firmware and software updates (over the air or in-person service); and**
- g. When the modified version / update was made available as a service component.**

Also, provide the above information for any modification or change that Mercedes-Benz is aware of which may be incorporated into vehicle production or pushed to subject vehicles in the field within the next 120 days.

Response to Request No. 7:

Mercedes-Benz has provided requested information in Mercedes-Benz IR Response Documents Part II (PE-21-20) – “CONFID. – CHANGE HISTORY.xlsx.” Additional information responsive to Request No. 7 is included in documents previously submitted as part of this Response in Mercedes-Benz IR Response Documents (PE21-20) – Response 1 Materials, “CONFID. – PRODUCTION DATA.xlsx.” (e.g., Request 1(d)(i) – (iii) requests software, firmware, and hardware *versions* in subject vehicles).

Information produced as part of this Response to Request No. 7 describes changes to core components of the Subject System DISTRONIC with Active Steering Assist, with respect to driver engagement / attentiveness and OEDR. Specifically, the table submitted with this

Response identifies and describes relevant changes in the hardware and software of the Intelligent Driver Controller (IDC), the Long Range Radar (LRR) and the Multi-Purpose Camera (MPC) (collectively, “core components” as described in Response to Request No. 5) that relate to changes in object recognition and/or customer interaction and attentiveness. [Redacted]

[Redacted]

¹ [Redacted]

[Redacted]

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