

Daimler Vans USA, LLC
A Daimler Company

May 19, 2010

The Honorable Ray LaHood
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

The Honorable Lisa Jackson
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Secretary LaHood and Administrator Jackson:

Daimler Vans USA LLC recognizes the benefits for the country of a uniform National Program to address greenhouse gases (GHGs) and fuel efficiency from medium and heavy-duty vehicles. Daimler Vans USA LLC therefore fully supports the adoption of a uniform National Program covering these vehicles, and welcomes this opportunity to be a partner in advancing that goal. Daimler Vans USA LLC is a major manufacturer of heavy-duty pickup trucks and vans, an important segment of the broader medium and heavy-duty vehicle industry. We look forward to working with EPA and NHTSA, the states, and other interested parties to help address three of the most pressing issues facing the U.S.: greenhouse gas reductions, fuel efficiency improvements, and energy security.

We support a National Program comprised of GHG emission standards and fuel efficiency standards that is consistent with the following principles.

Program Principles:

- Addresses heavy-duty pickups and vans in a fashion similar to the light-duty vehicle program issued jointly by EPA and NHTSA on April 1, 2010.
- Begins no earlier than model year 2014 with full implementation within 5 years.
- Closely harmonize all elements of the program under the various legal requirements from NHTSA and EPA.
- Establish standards for heavy-duty pickups and vans, as well as other medium and heavy-duty vehicles, in a manner that:
 - recognizes the needs of the trucking industry and other commercial users
 - increases the use of known technologies found to be feasible and effective in this market segment
 - preserves the utility and functionality of these commercial vehicles
 - is compatible with the complexities of the marketplace
 - avoids unintended consequences
- Significantly reduces CO2 emissions and achieves significant fuel savings for the Nation.
- Incentivize the early introduction of advanced technologies
- Continue to collaborate with other countries recognizing the global nature of the issues and the industry.

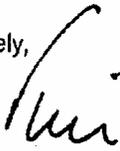
Daimler Vans USA, LLC
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Montvale, NJ 07645-0350

ES10-003673

Daimler Vans USA LLC understands that EPA and NHTSA will jointly propose the comprehensive National Program for full public review and comment, affording all interested parties the right to participate in a public hearing, and submit comments and other relevant information to the Agencies for consideration prior to reaching any final determinations. We also understand that EPA and NHTSA's preliminary analysis indicates that such a National Program could reduce up to approximately 250 MMT of CO₂, save up to approximately 500 million barrels of oil over the lifetime of all heavy-duty vehicles built during 2014-2018, and achieve approximately \$70 billion in fuel savings. Nevertheless, the results of the rulemaking are not pre-determined but depend upon processes set by laws. Daimler Vans USA LLC is committed to supporting the adoption of a uniform National Program consistent with these principles.

We thank you for undertaking this collaborative effort and look forward to working together in the future.

Sincerely,



Claus-Christoph Tritt
VP Operations
Commercial Vehicles
Daimler Vans USA LLC

Pettiford, Marie (OST)

From: michael.d.scott@daimler.com
Sent: Thursday, May 20, 2010 1:37 PM
To: LaHood, Ray (OST); Jackson.Lisa@epa.gov
Cc: orehowsky.karen@epa.gov; charmley.william@epa.gov; france.chet@epa.gov; Gary_S._Guzy@ceq.eop.gov; Thomson, Kathryn (OST); Mccarthy.Gina@epa.gov; Strickland, David (NHTSA); oge.margo@epa.gov; Medford, Ronald (NHTSA)
Subject: HD Pickup & Van GHG Support Letter, Daimler Vans USA LLC
Attachments: HD Pickup and Van GHG Support Daimler Vans USA LLC.pdf

Honorable Ray LaHood/Honorable Lisa Jackson,

Please find the attached HD Pickup and Van GHG Support letter submitted on behalf of Daimler Vans USA LLC.

Kind regards,

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Compliance Support Team
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