



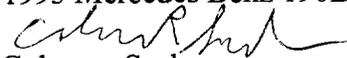
U.S. Department
of Transportation

Memorandum

**National Highway
Traffic Safety
Administration**

Subject: Petition for Import Eligibility of
1993 Mercedes Benz 190E Passenger Cars

Date: OCT 6 2004

From: 
Coleman Sachs
Office of Vehicle Safety Compliance

To: Docket Management

Please place the attached petition for a decision that 1993 Mercedes Benz 190E Passenger Cars are eligible for importation in Docket No. NHTSA-2004-19291.

Attachment

#

10/6/04 10:00 AM
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RECEIVED
OCT - 5 2004

J.K. Technologies, LLC.
3500 Sweet Air Street
Baltimore, Maryland 21211
410.366.6332
410.366.7655 (fax)
convert2us@aol.com
Registered Importer RI-90-006

RECEIVED
OCT 11 2004

Petition for Import Eligibility Determination

IAW 49 CFR 593.5 (A) (1)

August 31, 2004 – 10/5/04

Administrator
O.V.S.C.
National Highway Traffic Safety Administration
Room 6111
400 7th Street, SW
Washington DC, 20590
Attn.: NEF-32 Import Eligibility

Dear Mr. George Stevens,

The following is the basis for this petition:

Part 593.6-(a) (1)

The vehicle for which a determination is sought is 1993 Mercedes Benz 190E. We have examined the recall campaigns and we have found that there were no listings for these vehicles. All vehicle reports will have a recall campaign search included with them at the time of submission.

Part 593.6-(a) (2)

The vehicle, which is substantially similar to the petition vehicle, is the US version.

Part 593.6-(a) (3)

The vehicle, which we believe to be substantially similar, is manufactured for sale in the USA and it was certified to meet all applicable Federal Motor Vehicle Safety Standards ("FMVSS") in effect at the time of manufacture. The non-conforming model was not listed on the accepted DOT list in 55 CFR 219, pp219, 47418ff, or the updates that have been published. The differences between the USA model and the non-certified model are very minor and have been outlined in this petition.

NHTSA-2004-19291

Part 593.6-(a) (4)

Since a USA companion model exists, we seek your determination that our petition vehicle is substantially similar to the USA model and therefore is eligible for importation and modification in the "substantially similar" category. We have examined the printed text from the dealers both in the USA and in Europe and we have compared the parts list from Europe and the USA. We have determined both what differences exist and what parts will be necessary to bring our non-conforming model into compliance with all applicable FMVSS in effect at the time of manufacture.

These differences and the changes necessary, have been outlined in the following examination of each applicable FMVSS.

Part 593.6-(a) (5)

The following outline will show that our non-conforming vehicle was originally manufactured to the FMVSS in many areas in the same manner as its U.S. companion model. Many of the concerned parts have the same parts numbers as the USA model. In all areas that have to be modified the parts will be supplied by the OEM manufacturer. The modifications to this vehicle do not concern the basic structure; only easily removable and available parts.

FMVSS 101

The instrument cluster must be changed to the US part, which includes the correct placards and symbols.

FMVSS 102

The markings, starter interlock, shifting pattern, and brake effect are identical to those in the U.S. model.

FMVSS 103

The windshield defogging and defrosting systems are identical to those in the U.S. model.

FMVSS 104

The windshield wiping and washing systems are identical to those in the U.S. model.

FMVSS 105 – FMVSS 135

The hydraulic brake system and the parking brake system are identical to those in the U.S. model.

FMVSS 106

The brake hoses are identical to those in the U.S. model.

FMVSS 107

These systems meet this FMVSS.

FMVSS 108

The following modifications must be made to fully meet this FMVSS:

- a. Install U.S. model headlamps and front sidemarker lights.
- b. Install U.S. model taillamp assemblies, which incorporate rear sidemarker lights.
- c. Install high mounted stop light.

FMVSS 109

These vehicles come equipped with tires that bare the "DOT" symbol.

FMVSS 110

The tired placard must be installed to meet this FMVSS requirement.

FMVSS 111

The drivers inside and outside rearview mirrors meet this FMVSS. However, the passenger's rearview outside mirror must be changed to the U.S. companion model part or etched to show the appropriate saying to meet the requirements.

FMVSS 113

The hood latch system is identical to the one used on the U.S. model.

FMVSS 114

An anti- theft buzzer must be added to this vehicle to meet this FMVSS.

CFR 565 -FMVSS 215

A "Vehicle Identification Plate" must be added near the left windshield post and a reference and certification label must be added in the left front door post area to meet this FMVSS. Copies of all labels will be included in the final report.

FMVSS 116

These vehicles come equipped with the proper DOT brake fluid and the top of the master cylinder is labeled with the proper DOT information.

FMVSS 118

These vehicles meet this FMVSS.

FMVSS 124

The accelerator control system is identical to the U.S. model.

FMVSS 201

These systems meet this FMVSS.

FMVSS 202

These vehicles came equipped with head restraints that are identical to those on the U.S. model.

FMVSS 203

N/A when FMVSS 208 is met. This vehicle conforms to S5.1 of FMVSS 208, "Impact for steering control systems."

FMVSS 204

The steering shaft on this vehicle is energy absorbing and is identical to that used on the U.S. model.

FMVSS 205

The glass and glazing materials used on this vehicle are identical to those used on the U.S. model. They are clearly labeled with DOT AS-1 or DOT AS-2.

FMVSS 206

The door locks and retention components are identical to the USA model.

FMVSS 207

The seating system in this vehicle is identical to that used in the U.S. model.

FMVSS 208

This vehicle is equipped with a seat belt warning lamp that is identical to that used on the U.S. model. A seat belt buzzer must be added to this vehicle to meet this FMVSS. The passive restraint systems used in these vehicles consist of dual front airbags and knee bolsters. They also have combination lap and shoulder belts at the outboard front seating positions as well as the rear outboard seating positions. These manual systems are automatic, self-tensioning and are released by means of a single red push-button. These systems meet this FMVSS with no modifications. They have the US parts as delivered.

FMVSS 209

The seatbelt labels are identical to those on the U.S. model and they meet this FMVSS requirement.

FMVSS 210

The seatbelt anchorages are identical to those of the U.S. model.

FMVSS 211

These systems meet this FMVSS.

FMVSS 212

The windshield mounting is identical to that of the U.S. model.

FMVSS 214

Door bars in this vehicle are identical to those in the USA model.

49 CFR 581 or FMVSS 215

The bumpers and support structure for the bumpers on these vehicles are identical to the US model.

FMVSS 216

The bodies of these vehicles are identical to that of the U.S. model.

FMVSS 219

The windshield intrusion and the parts or components thereof, are identical to those of the U.S. model.

FMVSS 301

The fuel systems in these vehicles are identical to that of the U.S. model. Fuel spillage problems are controlled by the evaporative system that was installed by the factory for the EPA requirements. These evaporative systems have a rollover and check valve incorporated in their design.

FMVSS 302

This vehicle is equipped with interior materials that are identical to those used on the U.S. model.

Thank you for your attention,

J.K. Technologies, L.J..C.

By: Jonathan Weisheit, President

A handwritten signature in black ink, appearing to be 'Jonathan Weisheit', written over a horizontal line.