

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

WILLIAM P D CADE, et al.

Petitioner,

ENVIRONMENTAL PROTECTION AGENCY, Michael E Regan, Administrator

Respondent.

**A PETITION FOR A WRIT OF MANDAMUS  
COMPELLING THE EPA TO ENFORCE THE CLEAN AIR ACT**

To the Honorable Court:

I, the undersigned, respectfully petition this Honorable Court for a writ of mandamus compelling the United States Environmental Protection Agency ("EPA") to enforce the consumer protection provisions within the Clean Air Act ("CAA")<sup>1</sup> as it pertains to the provision of electronic emission control systems currently withheld by certain manufacturers but required to be available to individuals, independent, or third-parties engaged in the repair, servicing, or diagnosing of motor vehicles or motor vehicle engines used in agriculture, construction, and forestry.

Under the CAA, the EPA is required to ensure that manufacturers provide promptly to any person engaged in the repairing or servicing of motor vehicles or motor vehicle engines with any and all information needed to make use of the emission control diagnostics system and such

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<sup>1</sup> 42 U.S.C. §7401 et seq.

other information including instructions for making emission-related diagnosis and repairs<sup>2</sup>. Furthermore, no such information may be withheld if it is provided by the manufacturer to franchised dealers or other persons engaged in the repair, diagnosing, or servicing of motor vehicles or motor vehicle engines.<sup>3</sup> The CAA also explicitly prohibits any manufacturer from failing to make such information available.<sup>4</sup>

EPA regulations require manufacturers to “State clearly in your written maintenance instructions that a repair shop or person of the owner's choosing may maintain, replace, or repair emission control devices and systems.”<sup>5</sup> Nevertheless, this required text is only sometimes provided by manufacturers, see Exhibit A, often deep into the document. The CAA requires this language be printed on the first page, in bold face type, of a manufacturer’s manuals, yet no manuals of any type were found to meet this requirement.<sup>6</sup> This noncompliance significantly contributes to the public's misunderstanding of the CAA’s requirements that any and all such information must be promptly provided. Therefore, public statements by manufacturers suggesting that the EPA prohibits repair of emission systems by third parties and individuals goes unchallenged in a wide range of public discourse such as legislative hearings. For the past 5 years manufacturers have repeatedly made false and misleading claims that the EPA prohibits owners and third-party repair providers from making emission equipment repairs, thus reinforcing, and contributing to the current monopoly for these types of repairs.

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<sup>2</sup> 42 U.S.C. §7521 (m) (5) - Emission standards for new motor vehicles or new motor vehicle engines

<sup>3</sup> 42 U.S.C. § 7522 (a) (2) (D) Prohibited acts, Enumerated prohibitions.

<sup>4</sup> *ibid*

<sup>5</sup> 40 CFR § 1039.125 (f)

<sup>6</sup> 42 USC §7541 (c) (3) (A) “The manufacturer shall provide in boldface type on the first page of the written maintenance instructions notice that maintenance, replacement, or repair of the emission control devices and systems may be performed by any automotive repair establishment or individual . . .”

On October 26<sup>th</sup> I and another colleague met in person with Mr. Rodney Snyder, Senior Advisor for Agriculture, Office of the Administrator, EPA, in his Washington, DC, office along with Mr. Byron Bunker, Director Compliance Division, Office of Transportation and Air Quality, EPA, who joined virtually, where we discussed, in part, public statements by a manufacturer about EPA prohibiting third party and equipment owner's repair of engine emission systems. I witnessed during that October meeting Mr. Bunker reporting that he had spoken with representatives of an agricultural equipment manufacturer and stated he had asked them to cease making such statements, specifically, that the EPA prohibits emission vehicle system repairs by individuals and third parties. That manufacturer continues to this day to make such false claims publicly, notwithstanding the admonition of Mr. Bunker who is an integral part of the approval process of annual nonroad compression ignition vehicle and engine certifications for that manufacturer and others.

EPA engine certification regulations require manufacturers to comply fully with the provisions of the CAA and has very clearly stated how such compliance must be achieved, demonstrated, and maintained. Manufacturers "Unconditionally certify that all the engines in the engine family comply with the requirements of this part, other referenced parts of the CFR, and the Clean Air Act."<sup>7</sup> By knowingly allowing manufacturers to withhold the engines emission system parts, software tools, and documentation required by the CAA the EPA fails to implement the consumer protection provisions for engine emission system repairs and maintenance enacted by Congress specifically to prevent restrictions on consumer choice and market competition by manufacturers of agricultural, construction, and forestry equipment allowing manufacturers to monopolize repair of electronically controlled equipment thus violating the Sherman Act.

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<sup>7</sup> 40 CFR §1039.205 (w) What must I include in my application?

Fairmark Partners, LLP has submitted a complaint to the Federal Trade Commission (FTC) that further details a manufacturer's, John Deere & Company's, actions that prevent farmers and ranchers from getting any and all information needed to repair their own equipment or obtaining diagnostic software and other information necessary to repair their equipment.<sup>8</sup>

To date, the EPA has promulgated regulations for highway, stationary, and nonroad vehicle engine emission systems that require manufacturers to provide emission-related installation and maintenance instructions.<sup>9</sup> John Deere acknowledges their legal responsibility under 40 CFR 1068.101 (b) in a letter to Chair, Lina Kahn, of the Federal Trade Commission, dated 21-July 2021, see Exhibit B, page 2, the first full paragraph titled "Clean Air Act Emission Controls." The letter cites its exemption and a legal theory that is apparently accepted by the EPA. John Deere cites in this letter that paragraph (1) of the regulation, 40 CFR 1068.101 (b), titled tampering, as a justification for its actions but their argument inappropriately conflates repair and tampering.

Since 2015 the librarian of congress has consistently ruled that repair of agricultural equipment is not an infringing activity and adopted the following rule:<sup>10</sup>

Accordingly, based on the Register's recommendation, the Librarian adopts the following exemption:

Computer programs that are contained in and control the functioning of a motorized land vehicle such as a personal automobile, commercial motor vehicle or mechanized agricultural vehicle, except for computer programs primarily designed

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<sup>8</sup> <https://farmaction.us/wp-content/uploads/2022/03/Deere-Right-To-Repair-FTC-Complaint.pdf>

<sup>9</sup> 40 CFR §1068 - GENERAL COMPLIANCE PROVISIONS FOR HIGHWAY, STATIONARY, AND NONROAD PROGRAMS, Authority: 42 U.S.C. 7401-7671q., Source: 73 FR 59344, Oct. 8, 2008, unless otherwise noted

<sup>10</sup> <https://www.copyright.gov/1201/2015/>,

for the control of telematics or entertainment systems for such vehicle, when circumvention is a necessary step undertaken by the authorized owner of the vehicle to allow the diagnosis, repair or lawful modification of a vehicle function; and where such circumvention does not constitute a violation of applicable law, including without limitation regulations promulgated by the Department of Transportation or the Environmental Protection Agency; and provided, however, that such circumvention is initiated no earlier than 12 months after the effective date of this regulation.<sup>11</sup>

EPA opposed this rule in its letter of 17-July-2015 to the United States Copyright Office.<sup>12</sup>

Nevertheless, this rule was adopted and has been reaffirmed during each subsequent triennial Digital Millennium Copyright Act, 1201, public review, comment, and rulemaking. John Deere in their letter to Chair Kahn, and subsequently reused as Exhibit B in a Securities and Exchange Filing, a 14a-8-no-action letter<sup>13</sup> inappropriately ignores their legal obligation of the 6<sup>th</sup> paragraph of 40 CFR 1068.101 (b), that in part states: “You must also provide emission-related installation and maintenance instructions.”

Furthermore, some manufacturers are known to ignore 40 CFR 1068.110 (c) when owners make warranty claims for emission system repairs and maintenance services to manufacturer for all expenses related to diagnosing and repairing or replacing emission-related parts for independent service providers.

Unfortunately, the EPA’s lack of enforcement and regulatory oversight for CAA compliance

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<sup>11</sup> <https://www.copyright.gov/fedreg/2015/80fr65944.pdf>

<sup>12</sup> [https://copyright.gov/1201/2015/USCO-letters/EPA\\_Letter\\_to\\_USCO\\_re\\_1201.pdf](https://copyright.gov/1201/2015/USCO-letters/EPA_Letter_to_USCO_re_1201.pdf)

<sup>13</sup> <https://www.sec.gov/divisions/corpfin/cf-noaction/14a-8/2021/greencenturydeere111221-14a8.pdf>

allows some manufacturers of agricultural, construction, and forestry equipment to deliberately withhold and refuse to provide to vehicle owners or independent third-parties any and all emission system repair tools, software, and information on par with installation and maintenance instructions provided to franchise dealers. As a result of this withholding manufacturers effectively restrict these repairs by equipment owners and third parties. Other equipment owners have been granted some “dealer level” information, but this is done in an inconsistent and preferential manner yet can even be limited in such cases. The various limits are established during the installation of the software. However, to date, the EPA, clearly aware of at least some of these CAA violations has never given notice to the manufacturers or pursued enforcement to obtain uniform consistent and non-preferential access to any and all repair tools and related information, instead the complete capability is only provided to franchise dealers.

The physical and electronic control of emissions in agricultural, construction, and forestry equipment is virtually identical to that of other types of motor vehicles and engines, such as emission systems used in compression ignition highway vehicles. Any and all repair tools, software, and information have been available safely and securely for nearly a decade by cost effective, reliable, and profitable industry cooperation such as Mitchell1’s TruckSeries repair information<sup>14</sup>. Therefore, there is no valid reason, such as safety, cybersecurity, intellectual property rights, etc. for manufacturers to withhold any and all information from those engaged in the repair, servicing, or diagnosing of agricultural, construction, and forestry equipment.

Additionally, EPA regulations explicitly state manufacturers must apply good engineering

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<sup>14</sup> <https://mitchell1.com/truckseries/>

judgement,<sup>15</sup>

“You must use good engineering judgment for decisions related to any requirements under this chapter. This includes your applications for certification, any testing you do to show that your certification, production-line, and in-use engines/equipment comply with requirements that apply to them, and how you select, categorize, determine, and apply these requirements.”

The EPA has the authority to assess civil penalties upon manufacturers of up to \$44,539 for each engine or piece of equipment in violation of the CAA. Additionally, the EPA may “deny your application or suspend or revoke a certificate of conformity if . . . (7) [Manufacturers] take any action that otherwise circumvents the intent of the Act or this part.”

### **A Prayer for Relief**

I respectfully request that this Honorable Court issue a writ of mandamus compelling the EPA to take action to ensure that manufacturers of agricultural, construction, and forestry equipment are complying with the requirements of the CAA and EPA’s regulations and require any and all violators take immediate corrective action. Additionally, that the court direct the EPA to explicitly require and validate that manufacturers promptly provide any and all emission-related information to individuals engaged in the repair, servicing, or diagnosing of agricultural, construction, and forestry equipment or engines, each year before an engine family can be certified and for all previous engine family certifications that have been granted in the past 10 years. Finally, I ask the court to impose a requirement that the senior most executive of a

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<sup>15</sup> 40 CFR §1068.5 (a) How must manufacturers apply good engineering judgement?

manufacturer be required to attest in writing that the manufacturer's unconditional certification of each engine family requirement is true and correct.

Respectfully submitted, and attested, January 20<sup>th</sup>, 2023

/s/ William P D Cade

William P D Cade



**Exhibit A:**

# Air, Fuel, Coolant, and Exhaust Maintenance

## Required Emission-Related Information

**Service Provider**      **John Deere 5100ML, etc. Operator's Manual, page 161 of PDF**

A qualified repair shop or person of the owner's choosing may maintain, replace, or repair emission control devices and systems with original or equivalent replacement parts. However, warranty, recall, and all other services paid for by John Deere must be performed at an authorized John Deere service center.

DX,EMISSIONS,REQINFO-19-12JUN15

## Recommended Dealer Performed Service

### Check Engine Coolant Properties

#### MAINTENANCE INTERVAL

Annually

Ask your John Deere dealer to check engine coolant properties. Use Cool-Gard™ II only if additional coolant is required.

### Flush Cooling System and Replace Thermostat

#### MAINTENANCE INTERVAL

**Every 4500 Hours** if Cool-Gard™ II is used. Machine must be initially filled and only serviced with properly diluted Cool-Gard™ II coolant.

**Every 2000 Hours** if Cool-Gard™ II is not used.

Have your John Deere dealer flush the cooling system, replace thermostat, and fill the system with Cool-Gard™ II.

### Drain and Flush Fuel Tank

#### MAINTENANCE INTERVAL

Every 300 Hours

If excessive amounts of water or dirt are found in the fuel filter and water separator, ask your John Deere dealer to drain and flush fuel tank.

GS25068,0005A0F-19-05OCT18

## Check Engine and Exhaust Compartments for Debris

**IMPORTANT: Directing pressurized water at electronic/electrical components, connectors, bearings and hydraulic seals, fuel injection pump or other sensitive components can cause product malfunctions. Reduce pressure and spray at a 45 to 90 degree angle.**

**Directing pressurized air at electronic/electrical components or connectors can cause buildup of static electricity and product malfunctions.**

**Never steam clean or pour cold water on an injection pump that is operating or hot. Pump could seize.**

1. Shut off engine and allow to cool.
2. Open and raise engine hood.
3. Remove any crop or debris within engine and exhaust compartments, especially around turbocharger, exhaust manifold, and exhaust aftertreatment system.
4. Reinstall all shields. Close and securely latch hood.

DP51502,0002EA5-19-01NOV17

## Clean Diesel Particulate Filter (DPF)

1. When exhaust filter and warning light indicators are illuminated, ensure that exhaust filter cleaning is set to "Auto".
2. Operate machine above 1200 rpm to allow an automatic exhaust filter cleaning to occur.
3. If indicators remain illuminated after an automatic cleaning has occurred, additional cleaning is required. Perform parked exhaust filter cleaning (if system allows). (See Air, Fuel, Coolant, and Exhaust Operation section for procedure.)
4. If a parked exhaust filter cleaning has been performed and exhaust filter and warning light indicators are still illuminated, contact your John Deere dealer.

GS25068,0005A10-19-05OCT18

# John Deere Equipment Models 1999+ and Ops Manuls

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Inclusive

Note: There are multiple editions of manuals, most recent listed, North America versions, English editions

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No.	Type	Model ID	Start Date	End Date	Ops Manual ID	Title - First line(s)	Choosing Page	Choosing First Page	Year Copyright	
							Page	Page	Year	
1	Sprayer	6700	1999	2009	OMN200815	Issue I0	6700 Self-Propelled Sprayer	None	No	2000
2	Tractor	990	2000	2007	OMLVU10907	C0	Compact Utility Tractor with Gear Transmission 990	None	No	2000
3	Tractor	5105	2000	2007	OMRE72817	Issue J5	5105 and 5205 Tractors	None	No	2005
4	Tractor	5205	2000	2007	OMRE72817	Issue J5	5105 and 5205 Tractors	None	No	2005
5	Tractor	4010	2002	2005	OMR30680	H1	4010 DIESEL AND GASOLINE WHEEL TRACTORS	None	No	None
6	Tractor	4110	2002	2005	OMLVU13326	I3	Compact Utility Tractors 4110 and 4115	None	No	2003
7	Tractor	4115	2002	2005	OMLVU13326	I4	Compact Utility Tractors 4110 and 4116	None	No	2004
8	Tractor	6220	2002	2006	OMAL162071	Issue G5	6120, 6120L, 6220, 6220L, 6320, 6320L, 6420, 6420L and 6520L Tractors	None	No	2005
9	Tractor	6603	2002	2007	OMRE226033	ISSUE H3	6403 and 6603 Tractors	None	No	2013
10	Tractor	9120	2002	2007	OMAR228220	Issue A7	9120, 9220, 9320, 9420, 9520 and 9620 Tractors	None	No	2007
11	Tractor	9420	2002	2007	OMAR228220	Issue A7	9120, 9220, 9320, 9420, 9520 and 9620 Tractors	None	No	2007
12	Tractor	9420T	2002	2007	OMAR228229	Issue H6	9320T, 9420T, 9520T and 9620T Tractors	None	No	2006
13	Tractor	2210	2003	2005	OMLVU14661	G3	Compact Utility Tractor 2210	None	No	2002
14	Tractor	5103	2003	2008	OMRE268160	ISSUE L8	5103, 5203, 5303 and 5403 Tractors	None	No	2006
15	Tractor	5203	2003	2008	OMRE268160	ISSUE L8	5103, 5203, 5303 and 5403 Tractors	None	No	2006
16	Tractor	5303	2003	2008	OMRE268160	ISSUE L8	5103, 5203, 5303 and 5403 Tractors	None	No	2006
17	Tractor	7220	2003	2007	OMAR224647	Issue K6	7220, 7320, 7420 and 7520 Tractors	None	No	2006
18	Tractor	7320	2003	2007	OMAR224647	Issue K6	7220, 7320, 7420 and 7520 Tractors	None	No	2006
19	Tractor	7420	2003	2007	OMAR224647	Issue K6	7220, 7320, 7420 and 7520 Tractors	None	No	2006
20	Tractor	7520	2003	2007	OMAR224647	Issue K6	7220, 7320, 7420 and 7520 Tractors	None	No	2006
21	Combine	9560	2004	2006	OMH219418	Issue H5	9560 and 9660 Combines	None	No	2006
22	Combine	9560 STS	2004	2007	OMH225687	Issue B7	9560 STS Combine	None	No	2007
23	Sprayer	4920	2004	2006	OMN300349	Issue J5	4920 Self-Propelled Sprayer	None	No	2005
24	Tractor	4120	2004	2013	OMLVU17927	J7	Compact Utility Tractor 4120, 4320, 4520, 4720	None	No	2007
25	Tractor	4320	2004	2013	OMLVU17927	J8	Compact Utility Tractor 4120, 4320, 4520, 4721	None	No	2008
26	Tractor	4520	2004	2013	OMLVU17927	J9	Compact Utility Tractor 4120, 4320, 4520, 4722	None	No	2009
27	Tractor	4720	2004	2013	OMLVU17927	J10	Compact Utility Tractor 4120, 4320, 4520, 4723	None	No	2010
28	Tractor	7720	2004	2006	OMAR188670	Issue I5	7720, 7820 and 7920 Tractors	None	No	2005
29	Tractor	7820	2004	2006	OMAR188670	Issue I5	7720, 7820 and 7920 Tractors	None	No	2005
30	Sprayer	4720	2005	2007	OMN300549	Issue K6	4720 Self-Propelled Sprayer	None	No	2006
31	Tractor	3120	2005	2008	OMLVU19809	L8	Compact Utility Tractor 3120, 3320, 3520, 3720	None	No	2007
32	Tractor	3520	2005	2013	OMLVU19809	L10	Compact Utility Tractor 3120, 3320, 3520, 3722	None	No	2009
33	Tractor	3720	2005	2013	OMLVU19809	L11	Compact Utility Tractor 3120, 3320, 3520, 3723	None	No	2010
34	Tractor	5225	2005	2008	OMRE260579	ISSUE I0	5225, 5325, 5425, 5525 and 5625 Tractors	None	No	2020
35	Tractor	5325	2005	2008	OMRE260579	ISSUE I0	5225, 5325, 5425, 5525 and 5625 Tractors	None	No	2020
36	Tractor	5425	2005	2008	OMRE260579	ISSUE I0	5225, 5325, 5425, 5525 and 5625 Tractors	None	No	2020
37	Tractor	5525	2005	2008	OMRE260579	ISSUE I0	5225, 5325, 5425, 5525 and 5625 Tractors	None	No	2020
38	Tractor	2305	2006	2010	OMLVU23228	B0	Compact Utility Tractors 2305	None	No	2010
39	Tractor	2320	2006	2012	OMLVU16740	E2	Compact Utility Tractor 2320	None	No	2009
40	Tractor	2520	2006	2012	OMLVU19796	E2	Compact Utility Tractors 2520	None	No	2008
41	Tractor	3320	2006	2008	OMLVU19809	L9	Compact Utility Tractor 3120, 3320, 3520, 3721	None	No	2008
42	Tractor	8130	2006	2009	OMAR287583	ISSUE A9	8130, 8230, 8330, 8430 and 8530	None	No	2009
43	Tractor	8230	2006	2009	OMAR287583	ISSUE A9	8130, 8230, 8330, 8430 and 8530	None	No	2009
44	Tractor	8330	2006	2009	OMAR287583	ISSUE A9	8130, 8230, 8330, 8430 and 8530	None	No	2009
45	Tractor	8430	2006	2009	OMAR287583	ISSUE A9	8130, 8230, 8330, 8430 and 8530	None	No	2009
46	Tractor	8530	2006	2009	OMAR287583	ISSUE A9	8130, 8230, 8330, 8430 and 8530	None	No	2009
47	Tractor	8230T	2006	2009	OMAR287619	ISSUE L8	8230T, 8330T and 8430T Series Tractors	None	No	2008
48	Tractor	8330T	2006	2009	OMAR287619	ISSUE L8	8230T, 8330T and 8430T Series Tractors	None	No	2008
49	Tractor	8430T	2006	2009	OMAR287619	ISSUE L8	8230T, 8330T and 8430T Series Tractors	None	No	2008
50	Sprayer	4830	2007	2014	OMN405418	ISSUE L1	4730 and 4830 Self-Propelled Sprayer	None	No	2011
51	Sprayer	4930	2007	2011	OMN401971	ISSUE F0	4930 Self-Propelled Sprayer	None	No	2010
52	Tractor	5625	2007	2007	OMRE260579	ISSUE I0	5225, 5325, 5425, 5525 and 5625 Tractors	None	No	2020
53	Tractor	7430	2007	2012	OMAL171429	ISSUE A2	Premium Tractors 7130, 7230, 7330, 7430 and 7530	None	No	2012
54	Tractor	7730	2007	2011	OMRE325992	ISSUE C1	7630, 7730, 7830 and 7930 Tractors	None	No	2011
55	Tractor	7830	2007	2011	OMRE325992	ISSUE C1	7630, 7730, 7830 and 7930 Tractors	None	No	2011
56	Tractor	7930	2007	2011	OMRE325992	ISSUE C1	7630, 7730, 7830 and 7930 Tractors	None	No	2011
57	Tractor	9230	2007	2011	OMRE325893	ISSUE C1	9230, 9330, 9430, 9530 and 9630 Tractors	None	No	2011
58	Tractor	9330	2007	2011	OMRE325893	ISSUE C2	9230, 9330, 9430, 9530 and 9630 Tractors	None	No	2012
59	Tractor	9430	2007	2011	OMRE325893	ISSUE C2	9230, 9330, 9430, 9530 and 9630 Tractors	None	No	2012
60	Tractor	9530	2007	2011	OMRE325893	ISSUE C2	9230, 9330, 9430, 9530 and 9630 Tractors	None	No	2012
61	Tractor	9630	2007	2011	OMRE325893	ISSUE C2	9230, 9330, 9430, 9530 and 9630 Tractors	None	No	2012
62	Tractor	9430T	2007	2011	OMRE325897	ISSUE C1	9430T, 9530T and 9630T Tractors	None	No	2011
63	Tractor	9530T	2007	2011	OMRE325897	ISSUE C1	9430T, 9530T and 9630T Tractors	None	No	2011
64	Tractor	9630T	2007	2011	OMRE325897	ISSUE C1	9430T, 9530T and 9630T Tractors	None	No	2011
65	Combine	9570 STS	2008	2011	OMHXE13768	ISSUE G9	9570 STS Combine	None	No	2009
66	Combine	9670 STS	2008	2011	OMHXE22997	ISSUE G0	9670 STS and 9770 STS Combines	None	No	2010

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No.	Type	Model ID	Start Date	End Date	Ops Manual ID	Title - First line(s)	Choosing		
							Page	First Page	Year Copyright
67	Combine	9770 STS	2008	2011	OMHXE22997 ISSUE G1	9670 STS and 9770 STS Combines	None	No	2011
68	Combine	9870 STS	2008	2011	OMHXE22999 ISSUE G0	9870 STS Combine	None	No	2010
69	Sprayer	4730	2008	2014	OMN405418 ISSUE L1	4730 and 4830 Self-Propelled Sprayer	None	No	2011
70	Tractor	2720	2008	2012	OMLVU19798 E2	Compact Utility Tractors 2720	None	No	2009
71	Tractor	3005	2008	2013	OMLVU19591 E2	Compact Utility Tractor 3005	None	No	2009
72	Tractor	4005	2008	2012	OMLVU19594 E2	Compact Utility Tractor 4005	None	No	2009
73	Tractor	4105	2008	2015	OMLVU23475 E2	Compact Utility Tractors 4105	None	No	2010
74	Tractor	6230	2008	2012	OMAL171426 ISSUE A2	Premium Tractors 6230, 6330 and 6430	None	No	2012
75	Tractor	6430	2008	2012	OMAL171426 ISSUE A2	Premium Tractors 6230, 6330 and 6430	None	No	2012
76	Tractor	7130	2008	2012	OMAL171429 ISSUE A2	Premium Tractors 7130, 7230, 7330, 7430 and 7530	None	No	2012
77	Tractor	7230	2008	2012	OMAL171429 ISSUE A2	Premium Tractors 7130, 7230, 7330, 7430 and 7530	None	No	2012
78	Tractor	7330	2008	2012	OMAL171429 ISSUE A2	Premium Tractors 7130, 7230, 7330, 7430 and 7530	None	No	2012
79	Tractor	6120L	2008	2008	OMAL162071 Issue G5	6120, 6120L, 6220, 6220L, 6320, 6320L, 6420, 6420L and 6520L Tractors	None	No	2005
80	Combine	T670	2009	2021	OMZ105768 Issue A9	Combines T670	None	No	2008
81	Tractor	6330	2009	2011	OMAL171426 ISSUE A2	Premium Tractors 6230, 6330 and 6430	None	No	2013
82	Tractor	7630	2009	2012	OMRE325992 ISSUE C1	7630, 7730, 7830 and 7930 Tractors	None	No	2011
83	Tractor	3032E	2009	2021	OMLVU31846 ISSUE H6	3025E, 3032E, and 3038E	87	No	2016
84	Tractor	3038E	2009	2021	OMLVU31846 ISSUE H6	3025E, 3032E, and 3038E	87	No	2016
85	Tractor	5045D	2009	2014	OMSJ301049 ISSUE L3	5045D and 5055D Tractors (North America, Mexico and Australia) (December 2013)	None	No	2013
86	Tractor	5045E	2009	2021	OMSJ42016 ISSUE E1	5045E, 5055E, 5065E and 5075E FT4 (MY18-) Tractors	None	No	2021
87	Tractor	5055D	2009	2014	OMSJ301049 ISSUE L4	5045D and 5055D Tractors (North America, Mexico and Australia) (December 2013)	None	No	2014
88	Tractor	5055E	2009	2021	OMSJ42016 ISSUE E1	5045E, 5055E, 5065E and 5075E FT4 (MY18-) Tractors	None	No	2021
89	Tractor	5065E	2009	2021	OMSJ42016 ISSUE E1	5045E, 5055E, 5065E and 5075E FT4 (MY18-) Tractors	None	No	2021
90	Tractor	5065M	2009	2012	OMSJ10032 ISSUE I0	5065M and 5075M (IT4), 5085M, 5095M, 5095MH, 5105M and 5105ML (Tier 3) Tractors	None	No	2020
91	Tractor	5075E	2009	2021	OMSJ42016 ISSUE E1	5045E, 5055E, 5065E and 5075E FT4 (MY18-) Tractors	None	No	2021
92	Tractor	5075M	2009	2021	OMSJ14569 ISSUE H5	5065M and 5075M (IT4)	None	No	2015
93	Tractor	5083E	2009	2012	OMSJ12914 ISSUE C4	5083E Limited, 5093E Limited and 5101E Limited (Tier 3) Tractors	None	No	2011
94	Tractor	5085M	2009	2014	OMSU43612 ISSUE H5	5085M, 5100M, 5100MH, 5100ML, 5115M, and 5115ML (FT4) Tractors	None	No	2015
95	Tractor	5093E	2009	2012	OMSJ12914 ISSUE C4	5083E Limited, 5093E Limited and 5101E Limited (Tier 3) Tractors	None	No	2011
96	Tractor	5095M	2009	2013	OMTR124423 ISSUE H2	5095M, 5105M, 5120M, and 5130M (FT4) Tractors	198	No	2022
97	Tractor	5101E	2009	2013	OMSJ12914 ISSUE C4	5083E Limited, 5093E Limited and 5101E Limited (Tier 3) Tractors	None	No	2011
98	Tractor	5105M	2009	2012	OMTR124423 ISSUE H2	5095M, 5105M, 5120M, and 5130M (FT4) Tractors	198	No	2022
99	Tractor	6100D	2009	2012	OMRE283529 ISSUE K0	6100D, 6110D, 6115D, 6125D, 6130D and 6140D Tractors	None	No	2010
100	Tractor	6115D	2009	2015	OMSU38638 ISSUE H4	6105D, 6115D, 6130D and 6140D Interim Tier IV Tractors,	None	No	2013
101	Tractor	6130D	2009	2015	OMSU38638 ISSUE H4	6105D, 6115D, 6130D and 6140D Interim Tier IV Tractors,	None	No	2014
102	Tractor	6140D	2009	2015	OMSU38638 ISSUE H4	6105D, 6115D, 6130D and 6140D Interim Tier IV Tractors,	None	No	2014
103	Sprayer	4630	2010	2015	OMKK19656 ISSUE C4	4630 Self-Propelled Sprayer	None	No	2014
104	Tractor	8245R	2010	2010	OMRE592061 (H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
105	Tractor	8270R	2010	2010	OMRE592061 (H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
106	Tractor	8295R	2010	2010	OMRE592061 (H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
107	Tractor	8295RT	2010	2010	OMAR276060 ISSUE C1	8295RT, 8320RT and 8345RT Tractors	None	No	2011
108	Tractor	8320R	2010	2010	OMRE592061 (H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
109	Tractor	8320RT	2010	2010	OMAR276060 ISSUE C1	8295RT, 8320RT and 8345RT Tractors	None	No	2011
110	Tractor	8345R	2010	2010	OMRE592061 (H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
111	Tractor	8345RT	2010	2010	OMAR276060 ISSUE C1	8295RT, 8320RT and 8345RT Tractors	None	No	2011
112	Tractor	1023E	2011	2021	OMLVU24604	Compact Utility Tractors 1023E, 1026R	None	No	2011
113	Tractor	7215R	2011	2013	OMRE560402 ISSUE B3	7200R, 7215R, 7230R, 7260R and 7280R Tractors	None	No	2013
114	Tractor	7230R	2011	2020	OMRE560402 ISSUE B3	7200R, 7215R, 7230R, 7260R, and 7280R	None	No	2013
115	Tractor	8235R	2011	2014	OMRE564172 ISSUE B3	8235R, 8260R, 8285R, 8310R, 8335R and 8360R Tractors	None	No	2013
116	Tractor	8260R	2011	2014	OMRE564172 ISSUE B3	8235R, 8260R, 8285R, 8310R, 8335R and 8360R Tractors	None	No	2013
117	Tractor	8310R	2011	2014	OMRE592061 (H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
118	Tractor	8310RT	2011	2014	OMRE560341 ISSUE A3	8310RT, 8335RT and 8360RT Tractors	None	No	2013
119	Tractor	8335R	2011	2014	OMRE592061 (H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
120	Tractor	8335RT	2011	2014	OMRE560341 ISSUE A3	8310RT, 8335RT and 8360RT Tractors	None	No	2013
121	Tractor	8360R	2011	2014	OMRE564172 ISSUE B3	8235R, 8260R, 8285R, 8310R, 8335R and 8360R Tractors	None	No	2013
122	Tractor	8360RT	2011	2014	OMRE560341 ISSUE A3	8310RT, 8335RT and 8360RT Tractors	None	No	2013
123	Combine	S660	2012	2017	OMHXE75764 (G4)	S650, S660, S670, S680 and S690 Combines	None	No	2014
124	Combine	S670	2012	2017	OMHXE75764 (G4)	S650, S660, S670, S680 and S690 Combines	None	No	2014
125	Combine	S680	2012	2017	OMHXE75764 (G4)	S650, S660, S670, S680 and S690 Combines	None	No	2014
126	Combine	S690	2012	2017	OMHXE75764 (G4)	S650, S660, S670, S680 and S690 Combines	None	No	2014
127	Sprayer	4940	2012	2014	OMKK13308 ISSUE B3	4940 Self-Propelled Sprayer	None	No	2013
128	Tractor	5100M	2012	2021	OMSU54598 ISSUE I7	5075M, 5090M, 5100M, 5100MH, 5100ML, 5115M, and 5115ML (FT4) Tractors	242	No	2017
129	Tractor	6115R	2012	2015	OMAL212532 ISSUE K3	6105R, 6115R and 6125R Tractors	None	No	2013
130	Tractor	6125R	2012	2015	OMAL212532 ISSUE K3	6105R, 6115R and 6125R Tractors	None	No	2013
131	Tractor	6140R	2012	2015	OMAL211531 ISSUE F4	Tractors 6140R, 6150R, 6150RH, 6170R, 6190R and 6210R	None	No	2014
132	Tractor	6170R	2012	2014	OMAL211531 ISSUE F4	Tractors 6140R, 6150R, 6150RH, 6170R, 6190R and 6210R	None	No	2014

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*Note: There are multiple editions of manuals, most recent listed, North America versions, English editions*

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No.	Type	Model ID	Start Date	End Date	Ops Manual ID	Title - First line(s)	Choosing			
							Page	First Page	Year Copyright	
133	Tractor	6190R	2012	2014	OMAL211531	ISSUE F4	Tractors 6140R, 6150R, 6150RH, 6170R, 6190R and 6210R	None	No	2014
134	Tractor	6210R	2012	2014	OMAL211531	ISSUE F4	Tractors 6140R, 6150R, 6150RH, 6170R, 6190R and 6210R	None	No	2014
135	Tractor	9360R	2012	2014	OMRE560318	ISSUE B3	9360R, 9410R, 9460R, 9510R and 9560R Tractors	None	No	2013
136	Tractor	9410R	2012	2014	OMRE560318	ISSUE B3	9360R, 9410R, 9460R, 9510R and 9560R Tractors	None	No	2013
137	Tractor	9460R	2012	2014	OMRE560318	ISSUE B3	9360R, 9410R, 9460R, 9510R and 9560R Tractors	None	No	2013
138	Tractor	9460RT	2012	2014	OMRE560321	ISSUE B3	9460RT, 9510RT and 9560RT Scraper Tractors	None	No	2013
139	Tractor	9510R	2012	2014	OMRE560318	ISSUE B3	9360R, 9410R, 9460R, 9510R and 9560R Tractors	None	No	2013
140	Tractor	9510RT	2012	2014	OMRE560321	ISSUE B3	9460RT, 9510RT and 9560RT Scraper Tractors	None	No	2013
141	Tractor	9560R	2012	2014	OMRE560318	ISSUE B3	9360R, 9410R, 9460R, 9510R and 9560R Tractors	None	No	2013
142	Tractor	9560RT	2012	2014	OMRE560321	ISSUE B3	9460RT, 9510RT and 9560RT Scraper Tractors	None	No	2013
143	Tractor	1025R	2013	2021	OMLVU28480	ISSUE H5	1023E and 1025R Compact Utility Tractors	74	No	2015
144	Tractor	2025R	2013	2021	OMLVU28128	ISSUE I5	2025R and 2032R Compact	78	No	2015
145	Tractor	2032R	2013	2021	OMLVU28128	ISSUE I5	2025R and 2032R Compact	78	No	2015
146	Tractor	5085E	2013	2017	OMSJ14615	ISSUE H5	5085E and 5100E (IT4)	158	No	2015
147	Tractor	5100E	2013	2021	OMSJ14615	ISSUE H5	5085E and 5100E (IT4)	158	No	2015
148	Tractor	6105D	2013	2015	OMSU38638	ISSUE H4	6105D, 6115D, 6130D and 6140D Interim Tier IV Tractors,	None	No	2013
149	Combine	S650	2014	2017	OMHXE75764	(G4)	S650, S660, S670, S680 and S690 Combines	None	No	2014
150	Sprayer	R4030	2014	2021	OMKK41820	ISSUE H8	R4030, R4038, and R4045 Self-Propelled Sprayer/Spreader	658	No	2018
151	Sprayer	R4038	2014	2021	OMKK41820	ISSUE H8	R4030, R4038, and R4045 Self-Propelled Sprayer/Spreader	658	No	2018
152	Tractor	6105M	2014	2016	OMAL213158	ISSUE F4	6105M, 6115M, 6125M, and 6140M	None	No	2014
153	Tractor	6105R	2014	2015	OMAL212532	ISSUE K3	6105R, 6115R and 6125R Tractors	None	No	2013
154	Tractor	6115M	2014	2016	OMAL213158	ISSUE F4	6105M, 6115M, 6125M, and 6140M	None	No	2014
155	Tractor	6125M	2014	2016	OMAL213158	ISSUE F4	6105M, 6115M, 6125M, and 6140M	None	No	2014
156	Tractor	6140M	2014	2015	OMAL229717	ISSUE J2	Tractors 6130M, 6140M, and 6145M	490	No	2022
157	Tractor	6170M	2014	2015	OMAL213190	ISSUE F4	6150M and 6170M Tractors	None	No	2013
158	Tractor	7210R	2014	2020	OMRE592218	ISSUE H8	7R Tractors	521	No	2018
159	Tractor	7250R	2014	2020	OMRE592218	ISSUE H8	7R Tractors	521	No	2018
160	Tractor	7270R	2014	2020	OMRE592218	ISSUE H8	7R Tractors	521	No	2018
161	Tractor	7290R	2014	2020	OMRE592218	ISSUE H8	7R Tractors	521	No	2018
162	Sprayer	R4045	2015	2021	OMKK41820	ISSUE H8	R4030, R4038, and R4045 Self-Propelled Sprayer/Spreader	658	No	2018
163	Tractor	6110M	2015	2017	OMAL219620	ISSUE D0	6110M, 6120M, 6130M and 6145M Tractors	610	No	2020
164	Tractor	6110R	2015	2021	OMAL225932	ISSUE L1	6110R, 6120R and 6130R Tractors	574	No	2021
165	Tractor	6120M	2015	2017	OMAL219620	ISSUE D0	6110M, 6120M, 6130M and 6145M Tractors	610	No	2020
166	Tractor	6120R	2015	2021	OMAL225932	ISSUE L1	6110R, 6120R and 6130R Tractors	574	No	2021
167	Tractor	6130M	2015	2017	OMAL219620	ISSUE D0	6110M, 6120M, 6130M and 6145M Tractors	610	No	2020
168	Tractor	6130R	2015	2021	OMAL225932	ISSUE L1	6110R, 6120R and 6130R Tractors	574	No	2021
169	Tractor	6145M	2015	2017	OMAL219620	ISSUE D0	6110M, 6120M, 6130M and 6145M Tractors	610	No	2020
170	Tractor	6145R	2015	2021	OMAL218252	ISSUE K6	6145R, 6155R, 6155RH, 6175R, 6195R and 6215R Tractors	595	No	2016
171	Tractor	6155M	2015	2017	OMAL219652	ISSUE D0	6155M, 6175M and 6195M Tractors	483	No	2020
172	Tractor	6155RH	2015	2021	OMAL218252	ISSUE K6	6145R, 6155R, 6155RH, 6175R, 6195R and 6215R Tractors	595	No	2016
173	Tractor	6175M	2015	2021	OMAL219652	ISSUE D0	6155M, 6175M and 6195M Tractors	483	No	2020
174	Tractor	6175R	2015	2021	OMAL218252	ISSUE K6	6145R, 6155R, 6155RH, 6175R, 6195R and 6215R Tractors	595	No	2016
175	Tractor	6195M	2015	2021	OMAL219652	ISSUE D0	6155M, 6175M and 6195M Tractors	483	No	2020
176	Tractor	6215R	2015	2021	OMAL218252	ISSUE K6	6145R, 6155R, 6155RH, 6175R, 6195R and 6215R Tractors	595	No	2016
177	Tractor	8245R	2015	2020	OMRE592061	(H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
178	Tractor	8270R	2015	2020	OMRE592061	(H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
179	Tractor	8295R	2015	2020	OMRE592061	(H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
180	Tractor	8320R	2015	2020	OMRE592061	(H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
181	Tractor	8320RT	2015	2020	OMRE591961	(H8)	8RT Series Tractors (Serial No. 920001-)	381	No	2018
182	Tractor	8345R	2015	2020	OMRE592061	(H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
183	Tractor	8345RT	2015	2020	OMRE591961	(H8)	8RT Series Tractors (Serial No. 920001-)	381	No	2018
184	Tractor	8370R	2015	2020	OMRE592061	(H8)	8245R, 8270R, 8295R, 8320R, 8335R, 8345R and 8370R Tractors	504	No	2018
185	Tractor	8370RT	2015	2020	OMRE591961	(H8)	8RT Series Tractors (Serial No. 920001-)	381	No	2018
186	Tractor	9370R	2015	2021	OMRE569049	(H5)	9370R, 9420R, 9470R, 9520R, 9570R AND 9620R tractors	542	No	2017
187	Tractor	9420R	2015	2021	OMRE569049	(H5)	9370R, 9420R, 9470R, 9520R, 9570R AND 9620R tractors	542	No	2017
188	Tractor	9470R	2015	2021	OMRE569049	(H5)	9370R, 9420R, 9470R, 9520R, 9570R AND 9620R tractors	542	No	2017
189	Tractor	9470RT	2015	2021	OMRE596897	(H0)	9RT Tractors (Serial No. 921001-)	366	No	2020
190	Tractor	9520R	2015	2021	OMRE569049	(H5)	9370R, 9420R, 9470R, 9520R, 9570R AND 9620R tractors	542	No	2017
191	Tractor	9520RT	2015	2021	OMRE596897	(H0)	9RT Tractors (Serial No. 921001-)	366	No	2020
192	Tractor	9570R	2015	2021	OMRE569049	(H5)	9370R, 9420R, 9470R, 9520R, 9570R AND 9620R tractors	542	No	2017
193	Tractor	9570RT	2015	2021	OMRE596897	(H0)	9RT Tractors (Serial No. 921001-)	366	No	2020
194	Tractor	9620R	2015	2021	OMRE569049	(H5)	9370R, 9420R, 9470R, 9520R, 9570R AND 9620R tractors	542	No	2017
195	Sprayer	R4023	2016	2021	OMKK32686	ISSUE F6	R4023 Self-Propelled Sprayer	362	No	2016
196	Tractor	6155R	2016	2021	OMAL218252	ISSUE K6	6145R, 6155R, 6155RH, 6175R, 6195R and 6215R Tractors	595	No	2016
197	Tractor	6195R	2016	2021	OMAL218252	ISSUE K6	6145R, 6155R, 6155RH, 6175R, 6195R and 6215R Tractors	595	No	2016
198	Tractor	7310R	2016	2020	OMRE592218	ISSUE H8	7R Tractors	521	No	2018

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*Note: There are multiple editions of manuals, most recent listed, North America versions, English editions*

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No.	Type	Model ID	Date	Ops Manual ID	Title - First line(s)	Choosing Page	Choosing First Page	Year Copyright
199	Tractor	9470RX	2016	2021 OMRE596861 (H0)	9RX Tractors (Serial No. 811001-)	362	No	2020
200	Tractor	9520RX	2016	2021 OMRE596861 (H0)	9RX Tractors (Serial No. 811001-)	362	No	2020
201	Tractor	9570RX	2016	2021 OMRE596861 (H0)	9RX Tractors (Serial No. 811001-)	362	No	2020
202	Tractor	9620RX	2016	2021 OMRE584633	9RX Tractors (Serial No. 800000- )	495	No	2016
203	Tractor	2038R	2017	2021 OMLVU31185 ISSUE H8	2032R and 2038R	92	No	2018
204	Tractor	3025E	2017	2021 OMLVU31846 ISSUE H6	3025E, 3032E, and 3038E	87	No	2016
205	Tractor	3033R	2017	2021 OMLVU29135 ISSUE E4	3033R, 3039R and 3046R	116	No	2014
206	Tractor	3039R	2017	2021 OMLVU29135 ISSUE E4	3033R, 3039R and 3046R	116	No	2015
207	Tractor	3046R	2017	2021 OMLVU29135 ISSUE E4	3033R, 3039R and 3046R	116	No	2016
208	Tractor	4044M	2017	2021 OMLVU32267 ISSUE H6	4044M, 4044R, 4052M, 4052R, 4066M, and 4066R	144	No	2016
209	Tractor	4044R	2017	2021 OMLVU32267 ISSUE H6	4044M, 4044R, 4052M, 4052R, 4066M, and 4066R	144	No	2016
210	Tractor	4052M	2017	2021 OMLVU32267 ISSUE H6	4044M, 4044R, 4052M, 4052R, 4066M, and 4066R	144	No	2016
211	Tractor	4052R	2017	2021 OMLVU32267 ISSUE H6	4044M, 4044R, 4052M, 4052R, 4066M, and 4066R	144	No	2016
212	Tractor	4066M	2017	2021 OMLVU32267 ISSUE H6	4044M, 4044R, 4052M, 4052R, 4066M, and 4066R	144	No	2016
213	Tractor	4066R	2017	2021 OMLVU32267 ISSUE H6	4044M, 4044R, 4052M, 4052R, 4066M, and 4066R	144	No	2016
214	Tractor	5075GN	2017	2021 OMER444695 ISSUE B9	5075GV, 5090GV, 5075GN, 5090GN, 5100GN, and 5075GL Tractors	None	No	2019
215	Tractor	5075GV	2017	2021 OMER444695 ISSUE B9	5075GV, 5090GV, 5075GN, 5090GN, 5100GN, and 5075GL Tractors	None	No	2019
216	Tractor	5090GN	2017	2021 OMER444695 ISSUE B9	5075GV, 5090GV, 5075GN, 5090GN, 5100GN, and 5075GL Tractors	None	No	2019
217	Tractor	5090GV	2017	2021 OMER444695 ISSUE B9	5075GV, 5090GV, 5075GN, 5090GN, 5100GN, and 5075GL Tractors	None	No	2019
218	Tractor	5090M	2017	2021 OMSU54598 ISSUE I7	5075M, 5090M, 5100M, 5100MH, 5100ML, 5115M, and 5115ML (FT4) Tractors	242	No	2017
219	Tractor	5090R	2017	2021 OMSU53451 ISSUE D8	5090R, 5100R, 5115R, and 5125R (FT4)	192	No	2018
220	Tractor	5100GN	2017	2021 OMER444695 ISSUE B9	5075GV, 5090GV, 5075GN, 5090GN, 5100GN, and 5075GL Tractors	None	No	2019
221	Tractor	5100ML	2017	2021 OMSU54598 ISSUE I7	5075M, 5090M, 5100M, 5100MH, 5100ML, 5115M, and 5115ML (FT4) Tractors	242	No	2017
222	Tractor	5100R	2017	2021 OMSU53451 ISSUE D8	5090R, 5100R, 5115R, and 5125R (FT4)	192	No	2018
223	Tractor	5115M	2017	2021 OMSU54598 ISSUE I7	5075M, 5090M, 5100M, 5100MH, 5100ML, 5115M, and 5115ML (FT4) Tractors	242	No	2017
224	Tractor	5115ML	2017	2021 OMSU54598 ISSUE I7	5075M, 5090M, 5100M, 5100MH, 5100ML, 5115M, and 5115ML (FT4) Tractors	242	No	2017
225	Tractor	5115R	2017	2021 OMSU53451 ISSUE D8	5090R, 5100R, 5115R, and 5125R (FT4)	192	No	2018
226	Tractor	5125R	2017	2021 OMSU53451 ISSUE D8	5090R, 5100R, 5115R, and 5125R (FT4)	192	No	2018
227	Tractor	8400R	2017	2020 OMRE591961 (H8)	8RT Series Tractors (Serial No. 920001-)	381	No	2018
228	Combine	S760	2018	2021 OMDXE11176 (F1)	S760, S770, S780, and S790 Combines	604	No	2021
229	Combine	S770	2018	2021 OMDXE11176 (F1)	S760, S770, S780, and S790 Combines	604	No	2021
231	Combine	S790	2018	2021 OMDXE11176 (F1)	S760, S770, S780, and S790 Combines	604	No	2021
232	Sprayer	DTS10	2018	2020 (UNAVAILABLE)	"Error downloading content file"	(N/A)	(N/A)	(N/A)
233	Sprayer	STS10	2018	2020 (UNAVAILABLE)	Technical Manual - All inclusive	(N/A)	(N/A)	(N/A)
234	Sprayer	STS12	2018	2020 OMKK90551	STS12, STS16, STS20 Self-Propelled	383	No	2021
235	Sprayer	STS14	2018	2020 OMKK90551	STS12, STS16, STS20 Self-Propelled	383	No	2021
236	Sprayer	STS16	2018	2020 OMKK90551	STS12, STS16, STS20 Self-Propelled	383	No	2021
237	Tractor	5090EL	2018	2021 OMSU54538 ISSUE C1	5090E, 5090EL, and 5100E (FT4) Tractors	169	No	2021
238	Tractor	5100MH	2018	2019 OMSU54598 ISSUE I7	5075M, 5090M, 5100M, 5100MH, 5100ML, 5115M, and 5115ML (FT4) Tractors	242	No	2017
239	Tractor	9420RX	2018	2021 OMRE596861 (H0)	9RX Tractors (Serial No. 811001-)	362	No	2020
240	Sprayer	R4044	2019	2021 OMKK51056 ISSUE H8	R4030, R4038, R4044, and R4045 Self-Propelled Sprayer/Spreader	477	No	2018
241	Tractor	5090E	2019	2021 OMSU54538 ISSUE C1	5090E, 5090EL, and 5100E (FT4) Tractors	169	No	2021
242	Tractor	6135E	2019	2019 OMSU65872 ISSUE C2	6105E, 6120E, 6120EH and 6135E Final Tier IV Tractors	170	No	2022
243	Tractor	3025D	2020	2021 OMSJ32078 ISSUE A1	3025D, 3035D and 3043D Tractors,	None	No	2021
244	Tractor	3035D	2020	2021 OMSJ32078 ISSUE A1	3025D, 3035D and 3043D Tractors,	None	No	2021
245	Tractor	6230R	2020	2021 OMAL228760 ISSUE L1	6230R and 6250R	407	No	2021
246	Tractor	6250R	2020	2021 OMAL228760 ISSUE L1	6230R and 6250R	407	No	2021
247	Tractor	7R210	2020	2021 OMTA22619 ISSUE G1	7R Tractors	451	No	2021
248	Tractor	7R230	2020	2021 OMTA17289 ISSUE H0	7R 210, 7R 230, 7R 250, 7R 270, 7R 290, 7R 310, 7R 330	453	No	2020
249	Tractor	7R250	2020	2021 OMTA17289 ISSUE H0	7R 210, 7R 230, 7R 250, 7R 270, 7R 290, 7R 310, 7R 330	453	No	2020
250	Tractor	7R270	2020	2021 OMTA17289 ISSUE H0	7R 210, 7R 230, 7R 250, 7R 270, 7R 290, 7R 310, 7R 330	453	No	2020
251	Tractor	7R290	2020	2021 OMTA17289 ISSUE H0	7R 210, 7R 230, 7R 250, 7R 270, 7R 290, 7R 310, 7R 330	453	No	2020
252	Tractor	7R310	2020	2021 OMTA17289 ISSUE H0	7R 210, 7R 230, 7R 250, 7R 270, 7R 290, 7R 310, 7R 330	453	No	2020
253	Tractor	7R330	2020	2021 OMTA17289 ISSUE H0	7R 210, 7R 230, 7R 250, 7R 270, 7R 290, 7R 310, 7R 330	453	No	2020
254	Tractor	8R230	2020	2021 OMRE593195 (J1)	8R Tractors (Serial No. 200001-)	475	No	2021
255	Tractor	8R250	2020	2021 OMRE593195 (J1)	8R Tractors (Serial No. 200001-)	475	No	2021
256	Tractor	8R280	2020	2021 OMRE593195 (J1)	8R Tractors (Serial No. 200001-)	475	No	2021
257	Tractor	8R310	2020	2021 OMRE593195 (J1)	8R Tractors (Serial No. 200001-)	475	No	2021
258	Tractor	8R340	2020	2021 OMRE593195 (J1)	8R Tractors (Serial No. 200001-)	475	No	2021
259	Tractor	8R370	2020	2021 OMRE593195 (J1)	8R Tractors (Serial No. 200001-)	475	No	2021
260	Tractor	8R410	2020	2021 OMRE593195 (J1)	8R Tractors (Serial No. 200001-)	475	No	2021
261	Tractor	8RT310	2020	2021 OMRE593061 (J1)	8RT Series Tractors (Serial No. 927001-)	347	No	2021
262	Tractor	8RT340	2020	2021 OMRE593061 (J1)	8RT Series Tractors (Serial No. 927001-)	347	No	2021
263	Tractor	8RT370	2020	2021 OMRE593061 (J1)	8RT Series Tractors (Serial No. 927001-)	347	No	2021
264	Tractor	8RT410	2020	2021 OMRE593061 (J1)	8RT Series Tractors (Serial No. 927001-)	347	No	2021
265	Tractor	8RX310	2020	2021 OMRE593193 (J1)	8RX Tractors (Serial No. 804001-)	372	No	2021

# John Deere Equipment Models 1999+ and Ops Manuls

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130

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**Inclusive**

*Note: There are multiple editions of manuals, most recent listed, North America versions, English editions*

No.	Type	Model ID	Start Date	End Date	Ops Manual ID	Title - First line(s)	Choosing Page	Choosing First Page	Choosing Year
							Page	Page	Copyright
266	Tractor	8RX340	2020	2021	OMRE593193 (J1)	8RX Tractors (Serial No. 804001-)	372	No	2021
267	Tractor	8RX370	2020	2021	OMRE593193 (J1)	8RX Tractors (Serial No. 804001-)	372	No	2021
268	Tractor	8RX410	2020	2021	OMRE593193 (J1)	8RX Tractors (Serial No. 804001-)	372	No	2021
269	Combine	X91000	2021	2021	OMHXE162878 ISSUE LO	X9 1000 and X9 1100 Combines	512	No	2020
270	Combine	X91100	2021	2021	OMHXE162878 ISSUE LO	X9 1000 and X9 1100 Combines	512	No	2020
271	Tractor	5075GL	2021	2021	OMER444695 ISSUE B9	5075GV, 5090GV, 5075GN, 5090GN, 5100GN, and 5075GL Tractors	None	No	2019
272	Tractor	5125ML	2021	2021	OMSU55509 ISSUE F0	5100ML, 5115ML, and 5125ML	161	No	2020
273	Tractor	7R 350	2021	2021	OMTA28704 ISSUE G2	7R Tractors	438	No	2022
274	Tractor	9R390	2021	2021	OMTR118884	9RT Tractors (Serial No. 925011-)	332	No	2021
275	Tractor	9R440	2021	2021	OMTR118884	9RT Tractors (Serial No. 925011-)	332	No	2021
276	Tractor	9R440	2021	2021	OMTR118884	9RT Tractors (Serial No. 925011-)	332	No	2021
277	Tractor	9RT470	2021	2021	OMTR118884	9RT Tractors (Serial No. 925011-)	332	No	2021
278	Tractor	9RT520	2021	2021	OMTR118884	9RT Tractors (Serial No. 925011-)	332	No	2021
279	Tractor	9RT570	2021	2021	OMTR118884	9RT Tractors (Serial No. 925011-)	332	No	2021

**Exhibit B:**





Deere & Company World Headquarters  
One John Deere Place, Moline, IL 61265 USA

Cory J. Reed  
President, Worldwide Agriculture & Turf Division  
Production & Precision Ag  
Regions 3 & 4

18 July 2021

The Honorable Lina Khan  
Chair  
U.S. Federal Trade Commission  
600 Pennsylvania Ave, NW  
Washington, DC 202580

RE: Right to Repair and July 21 Open Commission Meeting

Dear Chair Khan:

On behalf of Deere & Company (“Deere”), I am pleased to submit the following comments in response to the Federal Trade Commission’s (“the Commission”) consideration of whether to issue a statement of policy on “repair restrictions.”

For 184 years, Deere has demonstrated its commitment to customers by providing high-quality equipment, technologies, and solutions that enhance productivity. This commitment includes fully supporting our customers’ right to maintain, diagnose, and repair their equipment and avoid unanticipated, unproductive, and costly downtime.

In the FTC’s May 2021 report (“report”) titled *Nixing the Fix: An FTC Report to Congress on Repair Restrictions*, the Commission noted that it intends to work to “ensure that consumers and independent repair shops have appropriate access to replacement parts, instructions, and diagnostic software.” Through our extensive offerings of repair materials, diagnostic tools, and parts, Deere is already meeting this goal.

In fact, Deere customers and independent service organizations (“ISO”) today can acquire service parts, operating and repair manuals, product guides, service demonstrations, fleet management information, on-board diagnostics, and electronic field diagnostic tools from a vast network of over 2000 authorized John Deere dealers.

The Commission’s *Nixing the Fix* report also acknowledges the wide disparity among categories of capital goods and consumer products and devices that could be affected by new policy in this area. The report concluded that it is “unlikely that there is a one-size-fits-all approach that will adequately address this issue.” Deere agrees with the Commission. The enormous variety of manufactured consumer and capital goods, their diverse uses and applications, the extent of intellectual property incorporated, the variety of distribution and service models in place, and the range of potential risks associated with use and misuse, all support a deliberate policy approach that accounts for these product-specific considerations.

Deere urges the Commission to consider the following critical points as it contemplates whether to issue a new right to repair policy statement:

### **Repair vs. Software Modification**

While Deere supports its customers’ right to repair their equipment, Deere does not support the right to modify the embedded software code in machines. Allowing access to embedded software code – the “right to modify” – would create significant environmental and safety risks to operators and bystanders, through illegal tampering and unauthorized hacking of safety controls, engine performance, and emissions controls required for Clean Air Act (“CAA”) compliance. Moreover, access to software for purposes of reprogramming is needed in less than two

percent of all repairs. It is also important to note that technology continues to evolve such that software reprogramming, when required, can increasingly be done remotely. This alleviates the need for an authorized technician to manually perform the reprogramming in person.

### **Clean Air Act Emissions Controls**

Section 203(a)(3) of the CAA and Section 1068.101(b) of Title 40, Code of Federal Regulations prohibit tampering with the emissions controls that non-road equipment manufacturers are required to install on their products. In a December, 2020 enforcement alert, the Environmental Protection Agency (“EPA”) noted how disabling or removing emissions controls from vehicles harms air quality and presents a threat to public health.<sup>1</sup> This is particularly concerning in light of a 2019 survey of 770 equipment dealers across the United States that found that 33 percent of dealers had observed unauthorized modifications of equipment brought into their dealership for service in the previous 24 months.<sup>2</sup> Of those, 45 percent responded that the modifications they observed included those that removed, impaired, or disabled EPA-mandated emissions controls. In addition to the environmental and safety concerns that such modifications present, dealers can also be held liable for CAA violations if the emissions tampering is not recognized and reversed.

### **Intellectual Property Interests**

The FTC’s report notes in footnote 18 that manufacturers’ intellectual property considerations were outside the scope of that report and therefore were not addressed. Yet Congress, through the Digital Millennium Copyright Act and amendments, has recognized these important rights and has tasked the U.S. Copyright Office with defining the circumstances in which exceptions to the prohibition on accessing software code embedded in equipment would apply. The Copyright Office, through its triennial review process, regularly considers petitions from the public to expand or limit this exception. The Copyright Office regulations have balanced these varied interests by consistently holding that the exception should extend only to “lawful” modifications that do not undermine federal emissions controls, jeopardize operator safety, or infringe upon legitimate intellectual property rights.<sup>3</sup> An unfettered right to modify the embedded software code in equipment would disrupt this balance and encourage the unlawful circumvention of long-established copyright and intellectual property protections.

### **Safety**

Software modification also has significant implications for equipment operator and bystander safety. Authorized John Deere dealers are contractually required to ensure that all machines sold or repaired are done so with the highest level of safeguarding for the end user and public. Requiring equipment manufacturers to provide unfettered access to embedded software code would enable and encourage modification of software in a way that bypasses certain safety protocols, while also potentially creating unsafe equipment as a byproduct. This is particularly problematic because such modifications can be untraceable, and in some cases, irreparable. In any case, they would be detectable only after injury or harm has occurred. It is not an overstatement to say that multi-ton construction and agricultural equipment pose far higher safety risks to users and bystanders than does a mobile phone or other consumer device.

### **Service Parts**

Through Deere’s extensive network of more than 2,000 dealer locations across the United States, customers and ISOs already have access to service parts so they can conduct the vast majority of repairs they may choose to undertake on their own. Equipment owners and ISOs today can purchase Deere service parts directly from John Deere dealers, as can any retail customer. In fact, Deere dealers today sell more parts through the retail parts counter than through their service bays. In addition, customers and ISOs may purchase home maintenance kits and other maintenance parts directly from Deere through the online John Deere Store.

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<sup>1</sup> *Aftermarket Defeat Devices and Tampering are Illegal and Undermine Vehicle Emissions Controls*, EPA Office of Enforcement and Compliance Assurance, December 2020

<sup>2</sup> *Modifications to Safety and Emissions Features in Off-Road Equipment*, Equipment Dealers Association, April 2019

<sup>3</sup> §201.40(b)(9) of Title 37, Code of Federal Regulations

## Conclusion

As the FTC considers policies to ensure the rights of owners and ISOs to repair heavy equipment, the Commission must recognize the substantial public and private interests already addressed in federal law that may be affected. Any contemplated changes to FTC policy should be subject to rigorous and transparent public review and comment that reflects all these interests. And any new policy must recognize the critical distinction between repair and modification. Deere opposes a right to modify embedded software code. However, we support our customers' right to repair their own equipment, and we work every day to provide the tools, materials, and guidance that allow our customers to reduce downtime and increase productivity.

Sincerely,

A handwritten signature in black ink, appearing to read "C. J. Reed". The signature is written in a cursive, slightly slanted style.

**Cory J. Reed**  
President, Worldwide Agriculture & Turf Division  
Production & Precision Ag  
Regions 3 & 4