

INFORMATION REDACTED PURSUANT TO THE FREEDOM  
OF INFORMATION ACT (FOIA), 5 U.S.C. 552(B)(6)

August 7, 2020

**COMPLAINT # 11343867**

Re: Recall on 1985 Mercedes 380SL Sub-Frame  
VIN Number: WDBBA45C7FA [REDACTED]

US Department of Transportation  
National Highway Traffic Safety Administration  
Office of Defects Investigation, NEF-100  
1200 New Jersey Avenue SE  
Washington, D.C. 20077-9382

Following up on the questioner that I received from you.

As I said when I first reported this problem I had my 1985 Mercedes 380SL at Roy's Auto Service in La Habra CA 90631. Phone number 562-697-3106. As Roy was doing an Oil Change, he noticed that the Sub Frame was broken in two different places. He notified me about this problem and that it was very dangerous to drive the car.

I in turn started looking for a Sub Frame and the first place I called was Mike at Miller's Mercedes Parts in Irvine CA. 92618. Phone number 714-557-0115. Mike alerted me that there was a recall on the Sub Frame awhile back so I contacted House of Imports (Mercedes) in Buena Park, CA 90621. Phone number 714-627-5553. Spoke to the Service Manager and he told me that I was out of luck because the recall had already ended.

Next thing I did was call Beach Benz in Huntington Beach CA 92647 and spoke to Mike which is the owner of the shop. He worked at a dealership in northern California until he decided to open his own shop which is doing really well. He remembers the recall on not only my car but other models also. He told me they all had the same problem with the Sub Frames.

I finally spoke to someone at the Distributor for Mercedes back east and also was told that the recall had been over for some time and that they couldn't or wouldn't help me regarding the broken Sub Frame.

I tried to tell them that the Sub Frame is not a wear and tear item like other parts in any car but it was like talking to a wall. My car has never been in an accident but as you can read, it was

probably manufactured using the wrong material that's why they kept breaking on all these cars.

I was very lucky that the owner of Roy's Auto Service noticed the broken Sub Frame otherwise I could have a very bad accident. (See picture enclosed)

Other pictures enclosed.

So I am hopeful you will be able to help me out in getting Mercedes to refund the money I paid to get my car repaired. Sub Frames for that type of car are very hard to find for obvious reasons.

There are no new ones available and I finally found a used one for \$650.00 which I had no choice but to buy it. Plus Sub Frame mount for \$350.00 and Engine mount for \$170.00 plus labor to replace the Sub Frame was \$570.00 for a total of \$1740.00.

As you can see by the pictures, my car sparkles it's so clean. Stays in the garage 99% of the time. I have a second car which is a Subaru.

Hopefully you can help me resolve this problem.

Regards,





U.S. Department of Transportation  
National Highway Traffic Safety Administration

**DOT Auto Safety Hotline**  
**Vehicle Owner's Questionnaire**  
To Report Vehicle Safety Defects  
1-888-DASH-2-DOT  
(1-888-327-4236)  
INTERNET: www.nhtsa.dot.gov/hotline

FOR AGENCY USE ONLY 100148

Date Received

07-AUG-2020

Repository

Reference No.  
11343867

**OWNER INFORMATION (Type or Print)**

Name

Address

City WHITTIER

State CA

Zip Code

Daytime Telephone Number

E-mail Address

Evening Telephone Number

The information you provide will be used to identify potential safety-related defects. We may share your information with the applicable vehicle manufacturer during an investigation or recall in accordance with the routine uses described in the agency's Privacy Act notice. See 49 FR 53971 (Sep. 3, 2004).

**VEHICLE INFORMATION**

17 digit Vehicle Identification Number Located at bottom of windshield on driver's side  
WDBBA45C7F

Make  
MERCEDES BENZ

Model  
380SL

Model Year  
1985

Date Purchased

Dealer's Name and Telephone Number  
PRIVATE PARTY

Engine:  
No: Cylinders 8

Fuel Type:  
GAS

Original Owner

Dealer's City

State

Zip Code

Transmission Type

AUTO

Antilock Brakes

Cruise Control

Powertrain

Multiple Failure:

Incident Date(s)

29-MAY-2020

**FAILED COMPONENT(S)/PART(S) INFORMATION**

Vehicle Component Codes: 020000 SUSPENSION, 161100 STRUCTURE: FRAME AND MEMBERS: UNDERBODY SHIELDS

Failure Mileage  
200000

Failure Speed

**ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A TIRE FAILURE**

Tire Make

Tire Model (Name or Number)

Tire Size (Example P215/65R15)

DOT No. (Example: DOTM19ABC036)

Original Equipment  
 Prior Repair

Failure Location:

Tire Component Code

Tire Failure Type:

**ADDITIONAL ITEMS TO BE COMPLETED WHEN REPORTING A CHILD SEAT FAILURE**

Make:

Date Manufactured:

Model No./Name:

Seat Type:

Installation System:

Child Seat Component Code:

Failed Part:

**APPLICABLE INCIDENT INFORMATION**

(Please describe in detail the incident(s), failure(s), crash(es), and injury(ies).)

Crash

Yes  No

Fire

Yes  No

Number of Persons Injured

Number of Deaths

Reported to Police

N

**Narrative Description of Incident(s), Crash(es), and Injury(ies).**

Please describe (1) events leading up to the failure, (2) failure and its consequences, and (3) what was done to correct the failure; i.e. parts repaired or replaced (and if old part is available).

TL\* THE CONTACT OWNS A 1985 MERCEDES BENZ 380 SL. THE CONTACT STATED THAT THE SUBFRAME UNDER THE FRONT OF THE VEHICLE WAS FRACTURED. AN INDEPENDENT MECHANIC DISCOVERED THE CRACK OF THE SUBFRAME WHILE PERFORMING AN OIL CHANGE. THE SUBFRAME WAS CRACKED IN TWO PLACES ON THE DRIVER'S SIDE. THE WELD WAS CRACKED AND COMPLETELY SEPARATED FROM THE SUBFRAME. THE CONTACT CALLED THE HOUSE OF IMPORTS (6862 AUTO CENTER DRIVE, BUENA PARK, CA 90621, 714-627-5553) AND THEY STATED THAT THE WARRANTY HAD EXPIRED AND THERE WAS NO RECALL ON THE VEHICLE AND QUOTED A REPAIR COST OF \$3,000. THEY ALSO STATED THAT THE VEHICLE WAS UNSAFE TO DRIVE. THE MANUFACTURER CONFIRMED THAT THE WARRANTY WAS EXPIRED WITH NO RECALLS. THE CONTACT HAD HIS MECHANIC REPLACE THE DAMAGED SUBFRAME WITH A USED ONE. THE FAILURE MILEAGE WAS 200,000.

Include, if available: Police/Fire Department Report, Photos, and Repair Invoice.

ATTACH ADDITIONAL SHEETS IF NECESSARY

The Privacy Act of 1974-Public Law 93-579 This information is requested pursuant to authority vested in the National Highway Traffic Safety Act and subsequent amendments. You are under no obligation to respond to this questionnaire. Your response may be used to assist the NHTSA in determining whether a Manufacturer should take appropriate action to correct a safety defect. If the NHTSA proceeds with administrative enforcement or litigation against a manufacturer, your response, or a statistical summary thereof, may be used in support of the agency's action.

**MY CAR**



# MY CAR



• ALL PARTS ARE NEW UNLESS SPECIFIED OTHERWISE

\*CODE U = USED R = REBUILT N = NEW



# ROY'S AUTO SERVICE, INC

## FOREIGN & DOMESTIC

631 W. Whittier Blvd., La Habra, CA 90631  
562/697-3106 • B.A.R. # FL 102379

Date 5-29 2012  
Time Rec'd 8 A.M.  
Promised 8 A.M.  
Written By Roy  
Cust. Order # \_\_\_\_\_

| QTY. ★ | PART NO. OR DESCRIPTION | SALE   |
|--------|-------------------------|--------|
| 1      | Sub Frame               | 650.00 |
| 4      | Sub Frame Mount         | 350.00 |
| 2      | Engine Mount            | 170.00 |
|        | Rear Engine Seal        | 25.00  |
|        | Front Trans Seal        | 20.00  |

Customer: Please fill in all the information in the blue shaded areas.

Name: 38056 Yr. Mk. Mod. 85 P H O N E  
Address: \_\_\_\_\_ Apt. # \_\_\_\_\_ Lic. \_\_\_\_\_  
City: \_\_\_\_\_ ZIP: \_\_\_\_\_ Speedo. \_\_\_\_\_ Engine Size \_\_\_\_\_  
Estimate \$ \_\_\_\_\_ Rev. Est. \$ \_\_\_\_\_ Time AM \_\_\_\_\_ PM \_\_\_\_\_ V.I.N. # \_\_\_\_\_  
Retain Parts  Destroy Parts   
Approved by  In Person  Ph. \_\_\_\_\_ Date \_\_\_\_\_ 201  
If vehicle is returned to customer without repair services being performed, a diagnostic and handling charge (including reassembling) of \$ \_\_\_\_\_ will be made.  
AUTHORIZATION: I acknowledge notice & oral approval of an increase in the original estimated price. Date \_\_\_\_\_  
Sign. X \_\_\_\_\_ 201  
Parts and labor are warranted for \_\_\_\_\_,000 miles or \_\_\_\_\_ months, whichever comes first. This warranty is limited to the work mentioned on this form only and is not transferable. Vehicle must be returned to our shop, at customer's expense, to honor warranty.  
**WARRANTY IS VOID IN CASE OF MISUSE AND/OR NEGLIGENCE.**

| OPER. NO. | REPAIR ORDER - LABOR INSTRUCTION - AT CUSTOMER'S REQUEST: | INTERNAL |
|-----------|---|----------|
|           | Replace Rear Engine main seal                             | 710.00   |
|           | Replace Trans Transmission seal                           |          |
|           | Replace Front Sub Frame                                   |          |
|           | Replace (2) Engine mount                                  | 570.00   |
|           | Replace Sub Frame Mount                                   |          |

COMPRESSION: 1 2 3 4 5 6 7 8

BY LAW, YOU MAY CHOOSE ANOTHER FACILITY TO PERFORM ANY NEEDED REPAIRS OR ADJUSTMENTS WHICH THE SMOG CHECK TEST INDICATES ARE NECESSARY.  
A Storage Fee of \$ \_\_\_\_\_ a day will be charged on all vehicles left over 48 hrs. after completion of work.  
A \$ \_\_\_\_\_ Service Charge will be applied on any returned check.

| REV. EST.:         | QTY | ENGINE OIL | TRANS. OIL <input type="checkbox"/> A.T.F. <input type="checkbox"/> | BRAKE FLUID | GREASE | COOLANT | GAS | TOTAL   |
|--------------------|-----|------------|---|-------------|--------|---------|-----|---------|
| Total Labor        |     |            |   |             |        |         |     | 1750.00 |
| Parts              |     |            |   |             |        |         |     | 1216.00 |
| Sublet Repairs     |     |            |   |             |        |         |     |         |
| Towing             |     |            |   |             |        |         |     |         |
| Storage _____ Days |     |            |   |             |        |         |     |         |
| Hazardous Waste    |     |            |   |             |        | 2       |     | 00      |
| Sub Total          |     |            |   |             |        |         |     |         |

Authorized By X  
**RECOMMENDED SERVICE:**  
1. \_\_\_\_\_  
2. \_\_\_\_\_  
3. \_\_\_\_\_  
4. \_\_\_\_\_  
5. \_\_\_\_\_  
*Thank You*

**TERMS:**  
• STRICTLY CASH ON DELIVERY.  
• Made in Money Order, Cashier Check or Cash.  
• NO PERSONAL CHECKS ACCEPTED!  
(unless previously approved by management)

Sales Tax % 100.32  
**TOTAL** 2566.32

Parts installed are not warranted beyond warranties given by respective manufacturers. No other warranties are made except as listed on this invoice.

**SUBLET REPAIRS**

Valves Machined  
Resurface Cylinder Heads  
Alignment  
Radiator

Return For Service  
TOTAL SUBLET REPAIRS

... and Keep it running!

**COST OF REPAIR ON MY 1985 MERCEDES 380SL**

|                     |                   |
|---------------------|-------------------|
| <b>SUB FRAME</b>    | <b>\$650.00</b>   |
| <b>FRAME MOUNT</b>  | <b>\$350.00</b>   |
| <b>ENGINE MOUNT</b> | <b>\$170.00</b>   |
| <b>LABOR</b>        | <b>\$570.00</b>   |
|                     | <hr/>             |
|                     | <b>\$1,740.00</b> |

**SEE INVOICE**

This is what happens when the Sub Frame breaks



## MY CAR – 1985 MERCEDES 380SL



## MY CAR – 1985 MERCEDES 380SL



# MY CAR – 1985 MERCEDES 380SL



# Mercedes Benz 107 MB107.COM



AdChoices

Marksheet App

107 Chassis

Parts Replacement Store

## We Can Repair Any Damage from the Road to the Suspension of Your Trailer.

Series 107 200SL 200SLC 300SL 300SLC 300SLC 300SLC 300SLC 420SL 420SLC 420SLC  
500SL 500SLC 560SL



## Mercedes Benz Series 107 Sub-Frame Recall S/L Recall Campaign # 191185120001

to Download

(SIL 33/001 Subframe Modification 11/1/85)

In this article sub frame, subframe and ("front axel carrier" term used by Mercedes in recall), are all the same part

It is VERY important to check the status of the attachments on your SL. Many cars haven't been recalled, and Mercedes interpreted the scope of the government-mandated recall in a narrow way: [350/450SL/SLC](#) are covered, but 380SL/SLC and

others using the same part subject to the same failure are NOT covered, therefore no one seems to be checking them. Check yours! It could save your life.

If the subframe fails you will drop the lower control arm onto the ground. Simply put (out of control!)

In a service bulletin from a local dealer. The bulletin covers 350/450 SL's and SLC's only. Those are 107.023/.043/.024/.044. The bulletin was issued in 11/85. It does appear that if you have a 280/300/380/420/500/560 you are not covered. Dealer should still be honoring this update for the 350/450 SL's and SLC's. Newer 107's have a boxed style unit attachment that appears to be stronger.

This was an important recall campaign as it fixes the problem of cracking steel subframes that can create a safety/hazard issue.

Note: You should understand that the sub-frame is subject to "sudden catastrophic failure" and should not be ignored.

All U.S. Model 107 450SL's up to 1980 are affected by this recall and it is still honored by Mercedes-Benz.

What is the sub frame problem? The sub-frame underneath the front end of the car can and may develop a crack that could cause the car to malfunction and cause injury.

How is it repaired? If the sub-frame has developed a crack the entire sub-frame will be replaced by Mercedes. If it has not cracked yet then a support will be welded in place to prevent the crack from occurring.

How to determine if your SL has had the repair done: Take your car to the nearest Mercedes Benz dealer and have them check the MBnet using your [vehicles' VIN number](#). Ask about SIL 33/001 Sub-frame Modification dated 11/1/85.

How much does it cost? The entire repair is covered fully under the recall. The only item not covered is the rubber sub-frame mount kit at \$280

The repair kit is to reinforce the subframe of a SL or other 107 to prevent it from cracking from the stresses that rust, pot holes, curbs, and other things impose on it.

The SL's are subject to a failure of the front lower control arm rear attachment to the subframe. This will result in loss of steering control and likely, a crash. The 450SL was recalled but Mercedes has never recalled other SL's and SLC's, that have the same defective subframe design.

The subframe problem never went away, Mercedes just decided to ignore it when they put the lighter aluminum V8 in the car! I had to replace the subframe in my '82 380SL because one of the lower control arm mounting tabs broke off! I have the new subframe in my '79 450SL, and it is MUCH stronger than the one in the '82, which is now the original subframe style with the reinforcing tabs. All the reinforcing

which is now the original subframe style with the reinforcing tabs. All the reinforcing tabs do is add some metal to each side of the lower control arm tabs.

[A new sub-frame from for Mercedes-Benz 1973-80 350/450 and 1981-85 380 and 1986-89 560 \(SL's + SLC's\) Part Number: 333-001](#) comes with the tabs boxed in, easily twice as strong as the original setup in the tab area. (All bushings and other [replacement parts](#) are available there as well). I imagine that all 380SLs and 560SLs will eventually need new subframes, or at least the reinforcing tabs installed. I don't know how they got away with limiting the recall to only the cars with cast iron engines installed. MB will honor the recall, but it only applies to the 350/450's with the cast iron engine. Not the 380SL or 560SL. In my opinion, they should have recalled all the 107 SL's.

As the subframes in these classic cars continue to age, they will become more and more prone to the stresses that pot holes, rust, curbs and other things impose on them. So, these kits provide very inexpensive insurance against the potentially costly and catastrophic failure the above person experienced and others could very well experience in the future.

Kits include 4 gussets that Mercedes sells for \$98-\$106, and installation instructions explaining how to weld them into place.



**MERCEDES SL 107 SUBFRAME REINFORCEMENT KIT >>>**

If you can't weld, you can have a muffler shop, body shop or other shop that does welding install the gussets for you, typically in an hour or two.

Speaking as a long-time SL owner, I believe the benefits of doing so could greatly outweigh the costs, aggravation and even injury that could result if the subframe cracks or breaks.



This is the newer boxed unit. (The original lower control arm attachment points on the rear of the subframe didn't have the boxed area at all). They only had the tabs projecting down,

and no side reinforcements at all, so if the car was curbed the tabs would break off. It would be pretty easy to box the front tabs also, and would probably be a good idea for your project. The whole front subframe began with the 114 cars, in fact my '82 has a 114 subframe under it right now. I had thought I remembered the boxing of the rear lower control arm tabs on the '79 going right under the arms, but after

looking under my two cars just now, I can see that it is like the photos. Not as strong as I remembered, but a huge step up from the old setup, which as someone said, they continued with through the '85 model year.

SAVE BIG \$\$\$\$\$\$ IN REPAIR AND MAINTENANCE COSTS!!!



Website Search

Secure Payments By:



NO PAYPAL ACCOUNT NEEDED!

Discussion Starter • #1 • Jun 9, 2009

5/5/11 15,782 views

***This thread is a compilation of sub frame repair and replacement information accumulated by BW107 posters over the years.***

While there never was a "subframe recall" issued for the C/R107 series there was an agreement between MBUSA and the USDOT to repair or replace defective subframes in 350/450 SL/SLC cast iron block models produced for the US market. This exempted all US M116 3.8 cars, and all Rest Of The World cars, regardless of powerplant, from service.

MB's claim, accepted by regulators, that the lighter aluminum block 3.8L V-8 would not cause the failure proved later to be less than accurate. The early style frame can crack regardless of engine cylinder count or block material.

The repair or replacement in question is 'MBUSA Service Information Letter 33/001, Sub-frame Modification dated 11/1/85'. Some dealerships readily acknowledge the ongoing existence of the recall, others are markedly reticent in expending any energy toward obtaining satisfaction for owners with issues. Several members have had luck getting replacement subframes installed or even reimbursement of out of pocket expenses for sub-frames replaced outside of the dealer network.



Whittier, CA

FIRST-CLASS PKG SVC - RTL™

0 Lb 3.80 Oz

1023

SHIP

TO:

Washington DC 20077

USPS TRACKING® NUMBER



9500 1145 9672 0275 2375 91

## Company Name

To: W48- 226

Mailstop: 4 West

Department: NVS-200,210,300,010

Phone:

Purchase Order (ItemVarName4) DELIVERY CONFIRMATION

Route



9500114596720275237591

US Department of Transportation  
National Highway Traffic Safety Administration  
Office of Defects Investigation, NEF-100  
1200 New Jersey Avenue SE  
Washington, DC. 20077-9382