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VIA FEDERAL EXPRESS

May 9, 2018

Mr. Jeffrey L. Quandt, Chief
Vehicle Defects Division D
Office of Defects Investigation
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Preliminary Evaluation PE18-002 to Investigate Allegations of Engine Compartment Fuel Hose Leakage in Model Year 2016 Mercedes-Benz Metris Vehicles; Response to Information Request

Dear Mr. Quandt:

This letter is submitted on behalf of our client, Daimler Vans, USA (DVUSA), to the National Highway Traffic Safety Administration ("NHTSA" or "Agency") in response to the Office of Defects Investigation's March 15, 2018 request for information relating to the Agency's investigation of allegations of engine compartment fuel hose leakage in model year (MY) 2016 Mercedes-Benz Metris vehicles.

Your request for information dated March 15, 2018 referred to Mercedes-Benz Vans, which is DVUSA's sister company, but DVUSA is the U.S. entity responsible for Mercedes-Benz Metris vehicles and therefore for this response. Accordingly, this letter refers to DVUSA rather than Mercedes-Benz throughout.

Pursuant to consultations with NHTSA, responses to Requests 1-7 are being submitted now, and DVUSA will submit responses to Requests 8-16 by May 24, 2018.

Requests 1-7 of your March 15, 2018 letter are repeated below, followed by the corresponding response.

Request No. 1:

State, by model and model year, the number of subject vehicles DVUSA has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by DVUSA, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Subject components part number and design version installed as original equipment;
- f. Date of manufacture;
- g. Date warranty coverage commenced; and
- h. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide the table in Microsoft Access 2010, or a compatible format, entitled "PRODUCTION DATA." See Enclosure 1, Data Collection Disc, for a pre-formatted table that provides further details regarding this submission.

Response to Request No. 1:

Make	Model	Model Year	# of Vehicles
Mercedes-Benz	Metris Cargo	2016	4,179
Mercedes-Benz	Metris Cargo	2017	2,300
Mercedes-Benz	Metris Passenger	2016	3,444
Mercedes-Benz	Metris Passenger	2017	958

Please see Attachment 1, Production Data, for the additional requested information regarding subject vehicles.¹

Request No. 2:

State the number of each of the following, received by DVUSA, or of which DVUSA is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:

- a. Consumer complaints, including those from fleet operators;
- b. Field reports, including dealer field reports;
- c. Reports involving a crash, injury or fatality;
- d. Reports involving a fire;
- e. Property damage claims;

¹ Please note that "subject vehicles" in the responses to this Information Request includes some MY 2017 Metris vehicles in addition to MY 2016 vehicles, because these MY 2017 vehicles were equipped with the subject components.

- f. Third-party arbitration proceedings where DVUSA is or was a party to the arbitration; and
- g. Lawsuits, both pending and closed, in which DVUSA is or was a defendant or codefendant.

For subparts “a” through “f, / g,” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” through “f, / g,” provide a summary description of the alleged problem and causal and contributing factors and DVUSA’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e/f” and “f, / g,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

Response to Request No. 2:

- a) DVUSA has identified 86 consumer complaints that relate to, or may relate to, the alleged defect in the subject vehicles. These consumer complaints were identified using broad search terms, as described in the response to Request No. 4 below. These complaints therefore may include complaints unrelated to the alleged defect.
- b) DVUSA has identified 17 field reports that relate to, or may relate to, the alleged defect in the subject vehicles.
- c) DVUSA has not identified any reports involving a crash, injury or fatality that relate to, or may relate to, the alleged defect in the subject vehicles.
- d) DVUSA has not identified any reports involving a fire that relate to, or may relate to, the alleged defect in the subject vehicles.
- e) DVUSA has not identified any property damage claims that relate to, or may relate to, the alleged defect in the subject vehicles.
- f) DVUSA has not identified any arbitration proceedings where it is or was a party that relate to, or may relate to, the alleged defect in the subject vehicles.
- g) DVUSA has not identified any lawsuits in which it is or was a defendant or codefendant that relate to, or may relate to, the alleged defect in the subject vehicles.

Request No. 3:

Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 2, state the following information:

- a. DVUSA’s file number or other identifier used;
- b. The category of the item, as identified in Request No. 2 (i.e., consumer complaint, field report, etc.);
- c. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- d. Vehicle’s VIN;
- e. Vehicle’s make, model and model year;
- f. Vehicle’s mileage at time of incident;

- g. Incident date;
- h. Report or claim date;
- i. Whether a crash is alleged;
- j. Whether a fire is alleged;
- k. Whether property damage is alleged;
- l. Number of alleged injuries, if any; and
- m. Number of alleged fatalities, if any.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "REQUEST NUMBER TWO DATA."

Response to Request No. 3:

The requested information is provided in Attachment 2, Request Number Two Data. Please note that certain owner information, including email addresses, is still being obtained and will be provided in an updated Attachment 2 later.

Request No. 4:

Produce copies of all documents related to each item within the scope of Request No. 2. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method DVUSA used for organizing the documents. Describe in detail the search methods and search criteria used by DVUSA to identify the items in response to Request No. 2.

Response to Request No. 4:

The requested documents are provided in Attachment 3, Request Number Two Documents (Customer Complaints) and Attachment 4, Request Number Two Documents (Field Reports).

To identify the items identified in response to Request No. 2, DVUSA first searched its vehicle documentation system for the subject Metris vehicles using the following filters:

- Fuel
- Leak
- Leakage
- Pump
- Hose
- Fuel Pump
- Fuel System Odor

For property damage claims, arbitration, and lawsuits, DVUSA reviewed its legal database for Metris vehicle cases.

The generated information was then filtered for cases that relate to, or may relate to, the alleged defect in the subject vehicles, where more detailed information was available.

Request No. 5:

State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by DVUSA to date that relate to, or may relate to, the alleged defect and/or the subject components in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. DVUSA's claim number;
- b. Vehicle owner or fleet name (and fleet contact person), street address, email address and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number(s);
- h. Problem code(s);
- i. Diagnostic trouble code(s);
- j. Replacement part number(s) and description(s);
- k. Concern stated by customer;
- l. Cause as stated on the repair order;
- m. Correction as stated on the repair order; and
- n. Additional comments, if any, by dealer/technician relating to claim and/or repair.

Provide this information in Microsoft Access 2010, or a compatible format, entitled "WARRANTY DATA."

Response to Request No. 5:

There have been a total of 762 claims paid by DVUSA to date that relate to, or may relate to, the alleged defect in the subject vehicles:

Model Year	Make	Model Name	Claims
2016	Mercedes-Benz	Metris Cargo	557
2017	Mercedes-Benz	Metris Cargo	82
2016	Mercedes-Benz	Metris Passenger	117
2017	Mercedes-Benz	Metris Passenger	6

The additional information requested in response to Request No. 5 is provided in Attachment 5, Warranty Data. Please note that owner information is still being obtained and will be provided in an updated Attachment 5 later.

Request No. 6:

Describe in detail the search methods and search criteria used by DVUSA to identify the claims in response to Request No. 5, including the labor operations, problem codes, diagnostic trouble codes, part numbers and any other pertinent parameters used.

Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions, diagnostic trouble codes and diagnostic trouble code descriptions applicable to the alleged defect in the subject vehicles. State whether the diagnostic trouble codes are automatically reported to the warranty database electronically or manually entered into the warranty database by a claims administrator.

State, by make and model year, the terms of the new vehicle warranty coverage offered by DVUSA on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that DVUSA offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.

Response to Request No. 6:

The claims reported in response to Request No. 5 were identified by running a query in the warranty database using the following criteria:

- Damage code 07307 (without damage type in order to capture any claims with incorrect damage type coding);
- Part numbers A2740700081, A2740700181, and A2740703500;
- Metris Baumuster 447.6 and 447.7;
- MY 2016 and subsequent; and
- Labor operation codes 47064301, 47169001, 47172001, 47173001, 47262001, and 42266001.

The generated list was then filtered for cases that relate to, or may relate to, the alleged defect in the subject vehicles.

The new vehicle warranty coverage for the subject vehicles is three years/36,000 miles.

Request No. 7:

Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that DVUSA has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins,

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advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also, include the latest draft copy of any communication that DVUSA is planning to issue within the next 120 days.

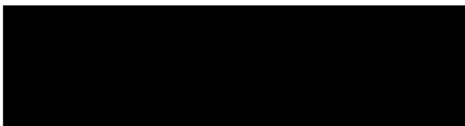
Response to Request No. 7:

DVUSA has identified a webinar slide that relates to, or may relate to, the alleged defect in the subject vehicles. This is provided as Attachment 6.

* * * *

Please do not hesitate to contact us should you have any questions regarding this response.

Sincerely,



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