



Mercedes-Benz

RECEIVED
OCT 24 2006 12:03
318

Mercedes-Benz USA, LLC
Rolf Scherer
General Manager, Engineering Services

October 24, 2006

SENT BY FAX 202-366-8065 AND CERTIFIED MAIL

Daniel C. Smith
Associate Administrator for Safety Assurance
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: 49 CFR Part 573 Information Report Update; Recall of Mercedes-Benz SLK (170) Tail Lamp. NHTSA Recall 05V-505

Dear Mr. Smith:

Pursuant to the requirements of 49 C.F.R. Part 573, and on behalf of our parent company, DaimlerChrysler AG (DCAG), this letter provides a status update on a voluntary recall that was originally reported to the Agency pursuant to Part 573 on October 28, 2005. Specifically, Mercedes-Benz USA, LLC (MBUSA) is providing additional information on the timing of owner notifications regarding the rear lamp module in certain SLK model vehicles described in the original October 28, 2005 report.

573.6(c)(8)(ii) Timing of Owner Notification

As a general matter, notification letters are being sent out to owners as soon as MBUSA receives a sufficient supply of replacement parts to meet the demand for replacement parts. Production capacity for the replacement rear lamp modules is limited, so the owner notification process for the re-designed rear lamp module is being phased over time as parts are produced and distributed to dealers.

Approximately 69,278 vehicles are potentially affected. The total population is made up of vehicles from two trim lines: 1) original trim (pre-face lift); and 2) updated trim (post-face lift). The two groups used slightly different rear lamp modules. Both the standard and interim notification plans are described below:



Standard Notification Plan

All affected vehicles will receive a standard notice as described below:

- *Original Trim Notification*

All approximately 32,600 vehicles from the original trim line were flagged in the vehicle management system on September 8, 2006. The owner notification process regarding the re-designed lamp module for these vehicles is being done in three phases. Phase I was mailed out to approximately 8,200 customers on September 12, 2006. The Phase II mailing is scheduled on or about November 3, 2006 for an additional group of approximately 8,200 customers. The Phase III mailing is scheduled for January, 2007, for the remaining group of approximately 16,300 customers.

- *Updated Trim Notification*

There are approximately 36,400 vehicles in the updated trim line. Based on the current production schedule for replacement parts, it is expected that all of these vehicles will be flagged in the vehicle management system in February, 2007. The owner notification process for these vehicles will be done in four phases. Phase I is currently planned for February, 2007, and includes approximately 9,100 customers. The Phase II mailing is planned for April 2007 for an additional group of approximately 9,100 customers. The Phase III mailing is planned for June 2007, for an additional group of approximately 9,100 customers. The Phase IV mailing is planned for August 2007, for an additional group of 9,100 customers.

Interim Notification Plan

In addition to the standard owner notifications described above regarding the availability of the re-designed parts, MBUSA will be making an additional interim communication to the owners of the up-dated trim (post-face lift) vehicles that will not get the recall notification before February 2007. Interim notifications will be done in a single mailing currently planned for November, 2006.

Daniel C. Smith
National Highway Traffic Safety Administration
October 24, 2006
Page 3

- Updated Trim Interim Notification

All owners of updated trim vehicles will get a letter notifying them that they will get a letter asking them to schedule an appointment for rear tail lamp replacement later in 2007, but if they experience an actual rear lamp failure before they receive that notice, they should come to their dealer immediately for a free repair. Interim repairs on the updated trim line vehicles will use the existing rear lamp design, and all such customers will get a second letter in 2007, notifying them of the need to get a permanent replacement lamp from their dealer at no charge.

* * * *

If you or your staff has any questions, please feel free to contact Gary Bowne at (201) 573-2719.

Sincerely,



cc: George Person
Thomas Z. Cooper