

Mercedes-Benz

Mercedes-Benz USA, LLC

Frank Diertl  
General Manager, Engineering Services

05V-560  
(2 pages)

December 15, 2005

Daniel C. Smith, Esq.  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration  
400 Seventh Street, SW  
Washington, DC 20590

Dear Mr. Smith,

This letter provides additional information regarding DaimlerChrysler AG's (DCAG's) agreement to provide owners of certain 2005/2006 model year C-Class Mercedes vehicles with new airbag inflator modules. As you know, NHTSA and DCAG have been discussing what DCAG perceives as testing irregularities identified by the Company in low risk deployment testing for 5<sup>th</sup> percentile female crash test dummies in out-of-position/unbelted position tests. While the Company prepares to submit data to the Agency, we have agreed to provide customers with a new module to eliminate any questions in the field.

The purpose of this letter is to provide the information needed by your staff to assign a campaign number to this program, so that MBUSA can begin the mailing of owner notification letters. The following sets forth the information you requested:

**Description of vehicles involved:** MY 2005/2006 C-Class vehicles equipped with sport-model steering wheels manufactured between May 2004 and November 2005.

**Number of Vehicles Involved:** Approximately 61,000

**Percentage of vehicles that will be included in the campaign:** 100%

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**Description of the Issue:** Earlier this year NHTSA began FMVSS 208 compliance testing on a C-Class model equipped with the sport steering wheel. All NHTSA testing to date has demonstrated compliance except for a single injury value in some low-risk deployment tests for the fifth percentile female crash test dummy in the out-of-position/unbelted portion of the test.

DCAG identified utilization of steering columns used in prior testing and test dummy positioning and taping as factors DCAG believes may have affected initial test values. NHTSA sufficiently addressed those factors in its most recent testing. In addition, DCAG has presented test data and computer simulation data demonstrating, in DCAG's view, that a test anomaly has likely affected NHTSA testing. DCAG is continuing to develop data supporting its contention that the test results have no real world impact and that the absence of a neck shield on the test dummy causes unrepresentative results with the sport steering wheel. However, in order to assure our owners there is no question of real world safety consequences while we continue testing and develop a proposal for a possible test change, we are notifying all owners that they should have their airbag modules replaced with a module that is designed to be compatible with the existing NHTSA test.

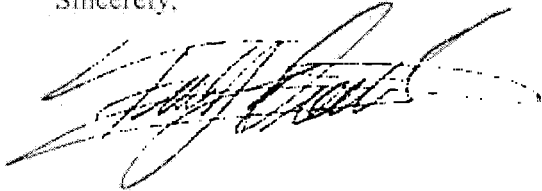
**Description of the proposed campaign:** MBUSA will offer owners of the vehicles described above a new airbag inflator module at no charge.

**Representative Copies of Communications with Dealers:** MBUSA will forward these as soon as available.

**Representative Copies of Communications with customers:** MBUSA will forward these as soon as available.

Please contact this office with the assigned campaign number. DCAG intends to begin the owner notification program in mid-March 2006.

Sincerely,

A handwritten signature in black ink, appearing to be "Daniel C. Smith", written over a set of horizontal lines.