



Mercedes-Benz

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 S and CL-Class (220/215) Instrument Cluster. NHTSA Recall 06V-028

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 you pursuant to Part 573 on February 1, 2006. Specifically, Mercedes-Benz USA, LLC (MBUSA) is providing an update on the number of vehicles potentially affected, and additional information on the timing of owner notifications regarding the Instrument Cluster on certain S-Class and CL-Class vehicles described in the original February 1, 2006 report.

573.6(c)(3): Total Number of Vehicles Potentially Containing the Defect

The original Part 573 report indicated that there were 36,911 vehicles potentially affected. At this point, approximately 6,532 vehicles originally manufactured during the periods of affected production have had their instrument clusters replaced under previous warranty repairs. Therefore, the remaining number of potentially affected vehicles which still have their original instrument clusters is 30,379. The potentially affected population of 30,379 vehicles is made up of approximately 29,579 standard S and CL models, and approximately 800 special AMG models.



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

Notification letters are, and will be, sent out to owners as soon as MBUSA has a sufficient supply of replacement parts to meet the demand for replacement parts. Production capacity for the replacement instrument clusters is limited, so the owner notification process is being phased over time as parts are produced and distributed to dealers.

All 29,579 standard S and CL vehicles were flagged in the vehicle management system on September 27, 2006. The owner notification process for these vehicles is being done in three phases. Phase I was mailed out to approximately 7,500 customers on September 29, 2006. The Phase II mailing is scheduled for December, 2006 for an additional group of approximately 7,500 customers. The Phase III mailing is scheduled for February, 2007, for the remaining approximately 15,000 customers.

The 800 AMG models incorporate a different instrument cluster configuration. A sufficient supply of replacement AMG instrument clusters for the recall are not yet available. We have a limited number of replacement units for the AMG models that experience actual failures, and all AMG models will be flagged in the vehicle management system no later than October 27, 2006. Owner notification to AMG owners will be included in Phase III.

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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