

Mercedes-Benz

Mercedes-Benz USA, LLC

Frank Diertl
General Manager, Engineering Services

06V-028
(5 Pages)

February 1, 2006

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

Re: Part 573 Information Report

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 advises you of a voluntary recall for certain Mercedes-Benz vehicles. Specifically, Mercedes-Benz USA, LLC (MBUSA) submits this report regarding the Instrument Cluster on certain S-Class and CL-Class vehicles described below.

573.6(c)(1): Manufacturer's Name

DaimlerChrysler AG, Stuttgart, Germany.

Designated Agent: Mercedes-Benz USA, LLC
Montvale, NJ 07645

573.6(c)(2): Identification of Vehicles

Make	Line	Model Year	Inclusive Dates of Manufacture
Mercedes-Benz	S-Class	2000-2001	06/2000-11/2000
		2002	01/2002-04/2002
		2004-2005	05/2004-09/2004
	CL-Class	2000-2001	06/2000-11/2000
		2002	01/2002-04/2002
		2004-2005	05/2004-09/2004



Daniel C. Smith
National Highway Traffic Safety Administration
February 1, 2006
Page 2

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

Approximately 36,911 S-Class and CL-Class vehicles are potentially affected.

573.6(c)(4): Percentage of Vehicles Estimated to Actually Contain the Defect

The percentage of vehicles that are projected to actually contain the issues described below is 60%.

573.6(c)(5): Description of Defect

The instrument cluster backlighting on the subject vehicles has experienced electrical malfunctions. The company has identified three distinct failure modes that have been traced to sub-component production issues from three separate production periods. Based on its recent analysis, the company has identified the following three failure modes, and three related periods of affected vehicle production:

- Transformer out of tolerance due to production problems:

A design change was made to the instrument cluster for production process optimization in June 2000. Due to this change, the supplier for the transformer used in the instrument cluster module moved production of the transformer from the Czech Republic to Romania.

For instrument clusters supplied for vehicles built from June 2000 to November 2000, the quality control procedures used in the new plant location in Romania for the copper winding process for the transformer production were not adequate. Accordingly, transformers manufactured during this time period have the potential to experience high voltage short circuits. These short circuits can lead – over time - to a failure of the peripheral electronic devices (e.g. transistors, fuses etc.), which act as the activation and deactivation source for the instrument cluster illumination.

By November 2000, routine new plant start-up checks had corrected the quality control procedures at issue and variations in the winding process were eliminated.

- Capacitor out of tolerance due to production problems

For instrument clusters supplied for vehicles built from January 2002 to April 2002, the 2nd tier-supplier producing the capacitor used in the subject vehicles' instrument cluster had production problems regarding the dielectric layers of the capacitor. During this time period, quality control procedures did not detect that in certain circumstances the dielectric layers of the capacitor may not be applied evenly. Non-homogeneous dielectric layers may lead to fluctuating current levels.

Fluctuating current levels can over time affect the instrument cluster transformer. These affects could lead – over time - to a failure of the peripheral electronic devices (e.g. transistors, fuses etc.), which act as the activation and deactivation source for the instrument cluster illumination.

In February 2002 the 2nd tier-supplier who produces the capacitor was changed to another 2nd tier-supplier with different production processes. The capacitors produced by the new 2nd tier-supplier have been assembled in the instrument cluster for vehicles produced beginning in April 2002, and no variations have been found in the dielectric layers.

- LED production tolerances

For instrument clusters supplied for vehicles built from May 2004 to September 2004, a certain portion of the supply of light emitting diodes (LEDs) used by the supplier in the subject vehicles' instrument cluster were of a type which needs higher current to produce the same level of brightness, compared to the other LED types supplied for the subject instrument clusters.

To obtain the specified LED brightness in the instrument cluster, the necessary current is achieved by adjusting pre-resistors which are connected in series to the LEDs on the circuit in the instrument cluster. With the lower-light-emitting

Daniel C. Smith
National Highway Traffic Safety Administration
February 1, 2006
Page 4

LEDs described above, more current needs to be switched (through the pre-resistor and the LED's) by the transistor to achieve specified brightness.

With the lower-light-emitting LEDs described above, the current switched by the transistor is high enough that over time the current may cause a failure of the transistor by overheating. This failure could lead – over time - to a total failure of the instrument cluster.

The low-light-emitting type of LED described above was eliminated from the supply pool for the subject instrument cluster, and that type of LED is no longer used by the supplier. As of September 2004, vehicles were no longer produced with instrument clusters containing the low-light-emitting LED type described above.

573.6(c)(6): Chronology of Principal Events

In November, 2005, NHTSA opened a preliminary evaluation of this issue based on seven owner complaints to the Office of Defects Investigation alleging loss of illumination of the instrument cluster. In the course of preparing a response to ODI's information request, DCAG determined that a Part 573 Defect Information Report and related recall were required to address this condition. As described above, DCAG identified three production issues with the potential to lead to malfunctions of the instrument cluster. Four of the complaints provided by ODI, and the vast majority of all warranty claims, fall within the three production periods identified. The three remaining complaints involve units produced between start of production, and June 2000. DCAG has not identified a defect or root cause associated with this period of production. DCAG notes that the NHTSA complaint relating to VIN# WDB NG70JXYA075022 allegedly occurred in connection with the failure of the blower motor fuse. DCAG also notes that the NHTSA complaint associated with VIN # WDB NG75J1YA067982 allegedly occurred in connection with an issue regarding the gear shifter. DCAG has not been able to reconstruct either of these failure modes, which appear to be unrelated to the production process issues and root causes identified above. DCAG was not able to obtain additional information or records to analyze the alleged malfunction in VIN # WDB NG70J7YA071252. DCAG will continue to monitor instrument cluster warranty claims and field reports from this period of production and conduct additional root cause analysis if necessary, as more information becomes available.

Daniel C. Smith
National Highway Traffic Safety Administration
February 1, 2006
Page 5

573.6(c)(8): Remedy Program

MBUSA will conduct a voluntary recall campaign for the subject S-Class and CL-Class vehicles described above. All affected instrument cluster modules will be replaced in the subject vehicles.

The owner notification will commence as soon as sufficient replacement parts are available to dealers. It will include instructions on how to obtain reimbursement for repairs that were made prior to the recall notification.

573.6(c)(9): Copies of Communications with Dealers or Purchasers

A copy will be provided when available.

573.6(c)(10): Copies of Proposed Owner Notification Letter

A copy will be provided when available.

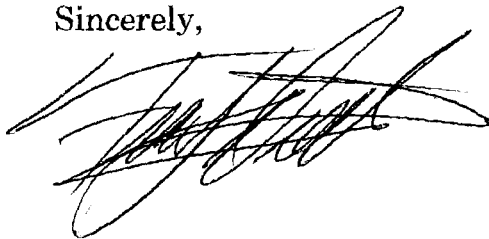
573.6(c)(11): Manufacturer's Campaign Identification Number

The MBUSA Recall Campaign Number will be provided when available.

* * * *

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