



Mercedes-Benz

Mercedes-Benz USA, LLC

A DaimlerChrysler Company

VIA CERTIFIED MAIL

November 16, 2007

National Highway Traffic Safety Administration
Office of Defect Investigation
Attention: George Person, Chief Recall Management Division NVS 215
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: 49 CFR Part 573.6; Recall of Mercedes-Benz C-Class (204) Rear Outboard Seatbelts

Dear Mr. Person:

Pursuant to 49 CFR Part 573.6, this letter contains 2 documents that were communicated to our dealers on the above subject and will be submitted in Mercedes-Benz USA, LLC (MBUSA) regular monthly mailing for the month of November, 2007.

Manufacturer's Campaign Identification Number
2007 100002

NHTSA Recall Number
07V-465

Should you have any questions, please do not hesitate to contact me at 201-573-2719.

Sincerely,

Gary H. Bowne
Department Manager
Product Compliance, Analysis, Safety and Emissions
Engineering Services

GB:sk

Enclosure



newschannel UPDATE

MERCEDES-BENZ USA, LLC

One Mercedes Drive, P.O. Box 350, Montvale, NJ 07645-0350
Phone (201) 573-0600
Fax (201) 573-0117
MBUSA.com

To: Mercedes-Benz Dealer Principals, General Managers, Sales Managers, Service Managers, Parts Managers

From: Gary Bowne; Department Manager; Product Compliance, Analysis, Safety and Emissions; Engineering Services

Date: November 16, 2007

Re: Recall Campaign 2007100002- Replace Rear Outboard Seat Belts Model 204, Model Year 2008

On October 1, 2007 the National Highway Traffic Safety Administration (NHTSA) was notified that Mercedes-Benz USA, LLC will conduct a voluntary Recall Campaign on certain model year 2008 C-Class (204) vehicles with regard to the rear outboard seat belts. This notification will be posted on the NHTSA web site and may generate some customer questions.

Daimler Chrysler AG (DCAG), the manufacturer of Mercedes-Benz vehicles, has decided that the rear outboard seat belt child restraint locking mechanisms in certain model year 2008 C-Class vehicles fail to conform to Federal Motor Vehicle Safety Standard No. 208, S7.1.1.5(a)(Occupant Crash Protection/Seat Belt Assembly/Adjustment). Mercedes-Benz USA, LLC (MBUSA) therefore has initiated a recall of these vehicles. Dealers will replace the rear outboard seatbelts in all affected vehicles.

Subject vehicles are equipped with rear seat belts designed with a mechanism that locks when used to secure a child restraint in the rear seat. In the event that the rear outboard seatbelts are used to secure a child restraint in these vehicles, the locking mechanism in the rear outboard seat belts may not perform as required by the applicable federal motor vehicle safety standard in the event of a crash or an emergency braking situation. Failure of the locking mechanism to perform properly in those circumstances could lead to injury. As a result, MBUSA is conducting a preventive recall to replace the rear outboard seatbelts and requests customers not use the rear outboard seat belts to secure a child restraint until the recall repair is performed.

The Recall Campaign is being launched today and the 5,813 affected vehicles will be flagged in VMI. The repair time for this campaign is 0.9 hours.

Owner notification will to be sent the week of November 19, 2007.

When scheduling customers for an appointment please ensure that you are aware of any open campaigns in VMI so that the customer is advised about the time necessary to complete all campaigns.

The rear outboard seat belt replacement rate is 100%. An initial allotment of parts will be sent to each dealer by the launch date. Dealers may order additional seat belts as required.

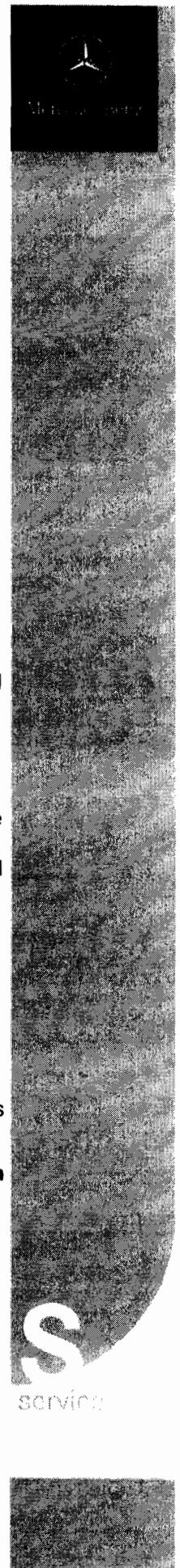
A copy of the campaign bulletin is attached, and may also be found on StarTekInfo.

Note: Please check VMI to determine if a vehicle is involved in this campaign. VMI must always be checked before performing campaigns to verify that the campaign is required on a specific vehicle.

Dealers may also identify vehicles subject to a campaign through **NetStar** by selecting "Campaign" under the Controlling tab. Only vehicles that have been retailed by the respective dealer will be displayed within this program.

While we regret any inconvenience this causes, Mercedes-Benz USA, LLC is determined to maintain a high level of vehicle quality and customer satisfaction.

Please refer all customer inquiries to the Customer Assistance Center at 1-800-FOR-MERCEdes (1-800-367-6372).



FILE: SERVICE: GROUP 00 OF SERVICE INFORMATION BINDER
PARTS: GROUP I OF INFORMATION – PARTS & ACCESSORIES BINDER

Campaign No. 2007100002, November 2007

TO: ALL MERCEDES-BENZ CENTERS

SUBJECT: **MODEL 204, MODEL YEAR 2008**
REPLACE REAR OUTBOARD SEAT BELTS

This Recall Campaign has been initiated because DaimlerChrysler AG (DCAG), the manufacturer of Mercedes-Benz vehicles, has decided that the rear outboard seat belt child restraint locking mechanisms in certain model year 2008 C-Class vehicles fail to conform to Federal Motor Vehicle Safety Standard No. 208, S7.1.1.5(a)(Occupant Crash Protection/Seat Belt Assembly/Adjustment). Mercedes-Benz USA, LLC (MBUSA) therefore has initiated a recall of these vehicles. Dealers will replace the rear outboard seat belts in all affected vehicles.

Attached is a sample copy of a letter which owners of the affected vehicles will receive.

Prior to performing this Recall Campaign:

- Please check VMI to determine if the vehicle is involved in the Campaign and if it has been previously repaired.
- Please review the entire Recall Campaign bulletin and follow the procedure steps exactly as described.

Please note that Recall and Service Campaigns **do not expire** and may also be performed on a vehicle with a vehicle status indicator.

Approximately 5,813 vehicles are involved.

Order No. P-RC-2007100002

This bulletin has been created and maintained in accordance with MBUSA-SLP S423QH001, Document and Data Control, and MBUSA-SLP S424HH001, Control of Quality Records.

Procedure

⚠ WARNING!

Risk of injury. Injuries may result when performing testing or repair work on seat belts. Prior to performing the following procedure carefully review and adhere to the safety instructions as described in the following WIS documents: AS91.00-Z-0001-01A, AS91.00-Z-0002-01A, AH91.00-P-0002-01M (repair caution) and AH91.00-P-0004-01A.

Note (regarding WIS instructions AS91.00-Z-0001-01A and AH91.00-P-0002-01M listed above):

It is not necessary to disconnect SRS control module harness connector from SRS control module during this procedure.

Note:

Seatbelt pretensioners **are regulated as a hazardous material (hazmat) in transportation.** Therefore, very specific regulations apply when preparing seat belt pretensioners for shipment (i.e. marking, labeling, packaging, documentation). In addition, dealership employees who prepare hazardous materials for transportation **must** be appropriately trained in hazmat transportation. Refer to page 5 "Hazardous Materials Shipping Guidance" for detailed instructions on how to prepare seat belt pretensioners for hazmat transportation by **ground**. This shipping **guidance** is provided to assist **a trained hazmat employee** in safely returning this article in compliance with the hazmat shipping regulation. Seat belt pretensioners returned for warranty consideration must be shipped in the original container, observing all applicable safety regulations concerning the shipping of warranty components classified as hazardous material.

1. Disconnect battery ground cable, refer to WIS: AR54.10-P-0003CW.
2. Remove left C-pillar paneling (1, Figure 1), refer to WIS: AR68.30-P-4490CW.

Note:

Refer to WIS: AR68.30-P-4490CW to remove the C-pillar paneling (1, Figure 1), seat cushion (3, Figure 1) and the lower mounting bolt.

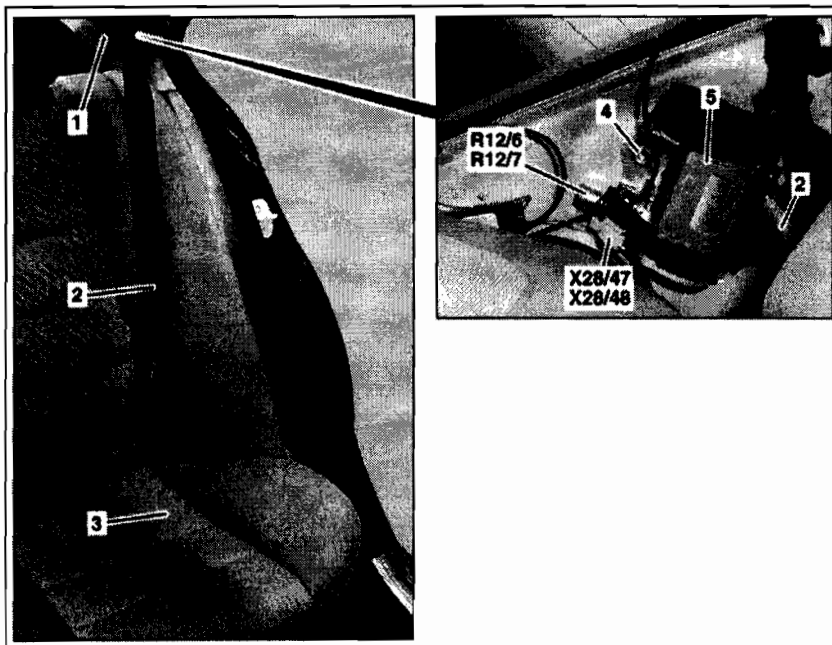


Figure 1

P91.40-2737-06

3. Disconnect left rear emergency tensioning retractor squib electrical connector (X28/47, Figure 1) from left rear emergency tensioning retractor squib (R12/6).

Note:

Right rear emergency tensioning retractor squib electrical connector component number is:

X28/48 (Figure 1):

4. Remove bolt (4, Figure 1) from automatic belt retractor (5) and remove automatic belt retractor (5).

Note:

When installing new seat belt retractor, torque bolt to 32 Nm.

5. Install in the reverse order.

Note:

- Observe proper installation for right and left versions of automatic belt retractors (5) to proper side of vehicle.
 - Ensure seat belt (2) is not twisted during installation.
 - Ensure tab on automatic belt retractor (5) is correctly inserted into C-pillar.
 - Seat belt will not extend unless the retractor (5) is mounted to the C-pillar (requires proper "X" "Y" axis for operation).
6. Repeat procedure on opposite side.
 7. Check SRS system with SDS then read out and erase DTC's, refer to WIS: AD00.00-P-2000-04A.

Primary Parts Information

Qty.	Part Name	Part Number	Estimated Replacement Rate
1	Left seat belt	A 204 860 91 85 05 XXXX ¹⁾	100%
1	Right seat belt	A 204 860 92 85 05 XXXX ¹⁾	100%

¹⁾ Include the corresponding color code 8K64 (buckskin) or 9C94 (black) when ordering.

Note:

¹⁾ XXXX Ensure to select/claim the correct seat belts based on the appropriate color code.

Note:

- Please be aware that only the part number(s) referenced in the Campaign Bulletin is approved for use to repair the vehicle. Repairs performed using any other part(s) will not have been performed in accordance with the campaign. Accordingly, warranty claims submitted with reference to an improper part number(s) will be denied.
- The following allowable labor operation should be used when submitting a warranty claim for this repair:

Warranty Information

Operation: SEAT BELT – REAR OUTBOARD SEAT BELTS, REPLACE (02-5836)

Damage Code	Operation Number	Labor Time (hrs.)	Model Indicator(s)
92 950 32 7	02-5836	0.9	CA, CB, CC

Hazardous Materials Shipping Guidance

Seat belt Pretensioners - Dealer Returns to Mercedes-Benz USA

This hazardous materials shipping guidance document provides instructions for shipping seat belt pretensioners as a dealer return to MBUSA using:

- (1) Common carrier ground transportation.
- (2) The “**Recycling**” exception in 49 CFR (the Hazardous Materials Regulations) for shipping seat belt pretensioners.

Part No’s Being Returned: A 204 860 29 85
A 204 860 30 85

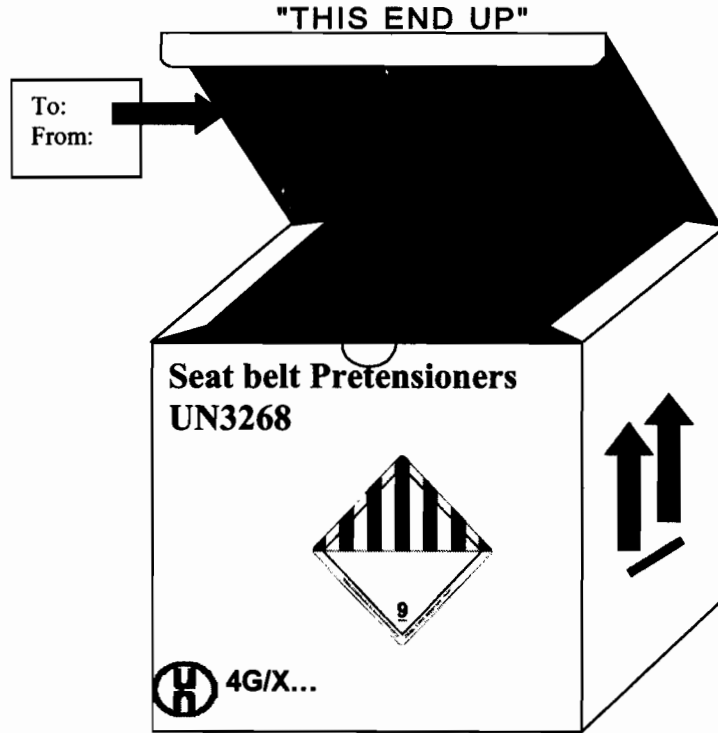
Packaging Requirements (refer to attached illustration):

- Remove new seat belt pretensioner from the UN 4G performance oriented packaging. Do so in a manner that does **NOT** damage this packaging or obliterate / damage package markings or labels. **SAVE THIS PACKAGING !!!!**
- Place pretensioner for return to MBUSA into the same UN 4G box. Package the return pretensioner in the same manner as the new (replacement) part.
- Ensure each pretensioner is securely packaged. The pretensioner should not be able to shift / move within the box. Seal box with sturdy plastic packing tape.
- Place the following package description (marking) clearly visible on one side of each UN 4G box:

Seat belt Pretensioners, UN3268

- Place the diamond shaped **CLASS 9** (Miscellaneous Dangerous Goods) hazard classification shipping label on the same side of the box as the description marking. (The box should be pre-labeled).
- Place a “**To / From**” address label on each individual box (see illustration for details)
- Close (appropriately seal for transport) the box.

Packaging Requirements (illustration)



Shipping Paper Requirements

Preparing the Bill of Lading for seat belt pretensioners being returned for recycling / resource reclamation.

STRAIGHT BILL OF LADING ORIGINAL - NOT NEGOTIABLE

PIECES	IN	HM	DESCRIPTION	WEIGHT	RATE	CHARGES	CLASS
1 box		X	UN3268, Seat-belt Pretensioner, 9, PGIII, RECYCLED	<i>Write gross weight of box(es) here</i>			

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation.

SHIPPER: **HazMat Employee Signs**

CARRIER: **Name of Carrier**

Emergency Contact: CHEMTREC 1-800-424-9300



Mercedes-Benz

Mercedes-Benz USA, LLC

Alan McLaren
Vice President, Customer Services

Recall Campaign #2007-100002

November, 2007

Dear Mercedes-Benz Owner,

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

DaimlerChrysler AG (DCAG), the manufacturer of Mercedes-Benz vehicles, has decided that the rear outboard seat belt child restraint locking mechanisms in certain model year 2008 C-Class vehicles fail to conform to Federal Motor Vehicle Safety Standard No. 208, S7.1.1.5(a)(Occupant Crash Protection/Seat Belt Assembly/Adjustment). Mercedes-Benz USA, LLC (MBUSA) therefore has initiated a recall of these vehicles. Our records indicate that your vehicle is included in the affected population of vehicles.

WE SENT YOU THIS NOTICE BECAUSE WE ARE CONCERNED ABOUT YOUR SAFETY.

The non-compliance relates to the use of the rear outboard seat belts in your vehicle to secure child restraints. Your vehicle is equipped with rear seat belts designed with a mechanism that locks when used to secure a child restraint in the rear seat. In the event that the rear outboard seatbelts are used to secure a child restraint in these vehicles, the locking mechanism in the rear outboard seat belts may not perform as required by the applicable federal motor vehicle safety standard in the event of a crash or emergency braking situation. Failure of the locking mechanism to perform properly in those circumstances could lead to injury. As a result, MBUSA is conducting a preventive recall to replace the rear outboard seat belts in your vehicle and requests that you not use the rear outboard seat belts to secure a child restraint until you have had the recall repair work performed.

The center rear seating position of your vehicle is not affected by this condition. Accordingly, the center rear seat belt's adjustable lap restraint can continue to be used to secure child restraints, in the center rear seating position, pending completion of the recall replacement of the rear outboard seat belts.

Please note: Your vehicle is also equipped with a child restraint anchoring system known as LATCH. When combined with a newer child restraint that has a LATCH compatible attachment mechanism designed to connect with the LATCH system, the restraint can be secured to the rear outboard seats without the use of the rear seat belt. Thus, while you must not use the rear outboard seat belts to secure a child restraint until the recall seat belt replacement has been performed, the LATCH system is fully operational in your vehicle and is the best way to secure a LATCH compatible child restraint. Mercedes strongly encourages you always to restrain children properly in the rear seat using LATCH-equipped child restraints whenever possible. The National Highway Traffic Safety Administration has mandated that new motor vehicles and new child restraints be LATCH-equipped because the LATCH systems better protect children in the event of a crash.

Your authorized Mercedes-Benz dealer has available replacement rear outboard seat belts that it will install in your vehicle to correct the situation described above. This service will be provided free of charge. The working time required is approximately 2 hours. As a matter of normal service process, your authorized Mercedes-Benz dealer will also check for other repair measures which might be applicable to your vehicle and this may increase the required working time. Please contact your authorized Mercedes-Benz dealer for additional information and to schedule an appointment at your earliest convenience. Please mention Recall Campaign #2007-100002.

If you are no longer the vehicle owner, or have a change of address, please complete the reverse side of this letter and return the complete letter in the enclosed envelope. If this is a leased vehicle and the lessor and registered owner receive this notice, please forward this information by first class mail to the lessee. If you have paid to have this recall condition corrected prior to this notice you may be eligible to receive reimbursement. Please see the reverse side of this notice for details.

Please contact your authorized Mercedes-Benz dealer should you have any questions or encounter any difficulty regarding this recall. If your dealer is unable to remedy your situation please contact us at 1-(800) FOR-MERCEdes (1-800-367-6372).

If an authorized Mercedes-Benz dealer or Mercedes-Benz USA, LLC, fails or is unable to perform this service without charge within 60 days, pursuant to law 49 U.S.C. Chapter 301, you may submit a complaint to the Administrator, National Highway Traffic Safety Administration, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590 or call the toll-free Auto Safety Hotline at 1-888-327-4236 (TTY 1-800-424-9153); or go to <http://www.safercar.gov>.

We apologize for any inconvenience this situation may cause you.

Sincerely,

One Mercedes Drive, P.O. Box 350, Montvale, NJ 07645-0350, Phone 1-800-FOR-MERCEdes (1-800-367-6372), Fax (201) 476-6211
www.MBUSA.com



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IMPORTANT

IF FOR ANY REASON YOU DO NOT NOW OWN THIS VEHICLE OR HAVE A CHANGE OF ADDRESS, PLEASE COMPLETE THE SECTION BELOW, PLACE IN THE ENCLOSED ENVELOPE, AND DROP IN ANY MAIL BOX. IF POSSIBLE, PROVIDE THE NAME AND ADDRESS OF THE PRESENT OWNER SO THAT WE MAY CONTACT THEM.

- SCRAPPED**
- STOLEN**
- OTHER** _____
- SOLD** **I HAVE SOLD THE VEHICLE TO:**
- MY NEW ADDRESS IS:**

NAME _____

STREET _____ **APT.** _____

CITY _____ **STATE** _____ **ZIP** _____

PHONE _____

THANK YOU FOR YOUR COOPERATION

****** PLEASE DO NOT DETACH. RETURN COMPLETE LETTER ****
DO NOT USE THE ENCLOSED ENVELOPE FOR OTHER CORRESPONDENCE**

Reimbursement to Customers for Repairs Performed Prior to Recall

If you have already paid to have this recall condition corrected you may be eligible to receive reimbursement.

Requests for reimbursement may include parts, labor, fees and taxes. Reimbursement may be limited to the amount the repair would have cost if completed by an authorized Mercedes-Benz dealer. The following documentation must be presented to your dealer for reimbursement.

Original or clear copy of all receipts, invoices and/or repair orders that show:

- **The name and address of the person who paid for the repair.**
- **The Vehicle Identification Number (VIN) of the vehicle that was repaired.**
- **What problem occurred, what repair was done, when it was done and who repaired it.**
- **The total cost of the repair expense that is being claimed.**
- **Proof of payment of repair (copy of front and back of cancelled check, or copy of credit card receipt).**
- **Reimbursement will be made by check from your dealer. If your claim is denied you will receive a letter from MBUSA within 60 days of receipt with the reason(s) for the denial.**

Please speak with your dealer concerning this matter.