



August 08, 2012

Mercedes-Benz USA, LLC
A Daimler Company**SENT BY E-MAIL (rmd.odi@dot.gov) AND CERTIFIED U.S. MAIL**

Ms. Nancy Lewis
 Associate Administrator, Enforcement
 National Highway Traffic Safety Administration
 Attention: Recall Management Division
 1200 New Jersey Avenue, S.E.
 NVS-200, Room W45-306
 Washington, D.C. 20590

Re: Part 573 Defect Information Report

Dear Ms. Lewis:

Pursuant to the requirements of 49 C.F.R. Part 573, and on behalf of our parent company, Daimler AG (DAG) and affiliates, this letter advises you of a safety-related defect that has been determined to exist in certain items of motor vehicle equipment. Specifically, Mercedes-Benz USA, LLC (MBUSA) submits this report regarding the all-season rubber floor mats supplied by Mercedes-Benz Accessories GmbH for use in Model Year 2012-13 Mercedes-Benz ML-Class vehicles.

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

Mercedes-Benz Accessories GmbH
 Am Wallgraben 125
 D-70565 Stuttgart
 Germany

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

573.6(c)(2)(iii): Identification of Items of Motor Vehicle Equipment

Make	Name of the Component	Part Number	Inclusive Dates of Manufacture
Mercedes-Benz Accessories GmbH	All-season floor mat	A1666801048-9051 A1666801048-7J07	July 2011 - July 2012



573.6(c)(2)(iv): Supplier of Affected Component and Country of Origin

ZPV Rožnov, s.r.o
Televizní 2614
75664 Roznov pod Radhostem
Czech Republic

573.6(c)(2)(v): Other Purchasers of Items of Motor Vehicle Equipment

MBUSA is the only purchaser of the subject floor mats for distribution in the U.S.

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

Approximately 8,675 potentially affected all-season floor mats have been sold to MBUSA.

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

The percentage of all-season floor mats that are projected to actually contain the defect described below cannot be determined.

573.6(c)(5): Description of Defect

DAG has determined that the subject all-season floor mat, which can only be purchased as an accessory from authorized Mercedes-Benz dealers for use in the current ML-Class (166 platform), may have the potential to temporarily interfere with the gas pedal of this vehicle under certain circumstances. The all-season floor mat designed for the 166 platform may not fully conform to the contour of the vehicle's floor pan as intended. In cases where the mat does not properly conform, the designed clearance between the mat and gas pedal may be reduced. In extreme cases, DAG cannot rule out the possibility that the clearance could be reduced to a level where a temporary interference between the subject floor mat and the gas pedal could occur when the gas pedal is in the fully extended position. This might lead to delayed gas pedal retraction. If this were to occur, the vehicle may not decelerate as expected when the driver lifts their foot from the gas pedal, which could increase the risk of a crash. The Mercedes-Benz electronic Brake-Override-Function is standard equipment in all current Mercedes-Benz models, including the subject vehicles. Therefore, drivers can bring the vehicle to a stop by depressing the brake pedal, even while the gas pedal is fully depressed to the floor. Where both the brake pedal and gas pedal are depressed at the same time, vehicle electronics override the constant gas pedal signal and bring the engine to idle as long as the driver keeps the brake pedal depressed.

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

In March 2012, while preparing a single company-owned ML-Class (166 platform) vehicle for a long-term quality test, the vehicle preparation personnel identified issues with the fit of the all-season rubber floor mat. After internal review, including component inspection and analysis, and test drives in April-June 2012, and a clearance measurement survey in vehicles in July 2012, the company determined that there was the potential for the new all-season floor mat to reduce the level of clearance between gas pedal and floor mat to a point that was not within DAG's design parameters, and that the all season floor mat should be re-designed.

573.6(c)(8)(i): Remedy Program

MBUSA will conduct a voluntary recall campaign for the subject all-season floor mats described above. The recall campaign will be conducted to replace the all-season floor mats with a modified version that cannot interfere with the gas pedal.

573.6(c)(8)(ii): Estimated Date of Owner Notification

MBUSA estimates owner notification will begin in September, 2012.

573.6(c)(10): Copies of Communications with Dealers or Purchasers

A copy of all communications will be provided to NHTSA when available.

573.6(c)(11): Copies of Proposed Owner Notification Letter

A copy of the owner notification will be provided when available.

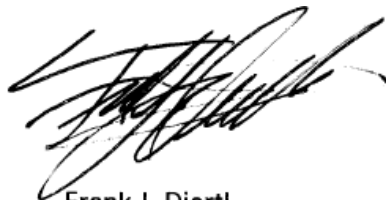
573.6(c)(12): Manufacturer's Campaign Identification Number

The MBUSA Recall Campaign Number will be provided when available.

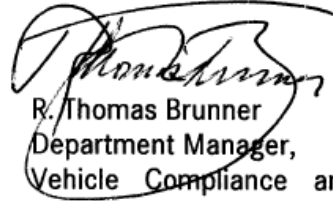
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Should you have any questions, please do not hesitate to contact Mr. R. Thomas Brunner at brunnert@mbusa.com.

Sincerely,



Frank J. Diertl
General Manager,
Engineering Services



R. Thomas Brunner
Department Manager,
Vehicle Compliance and Analysis