



Mercedes-Benz USA, LLC A Daimler Company

October 5, 2012

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), this letter advises you of a voluntary safety-related recall for certain Mercedes-Benz vehicles. Specifically, Mercedes-Benz USA, LLC (MBUSA) submits this report regarding the right side window curtain air bag in certain Model Year 2012 Mercedes-Benz E-Class Coupe (C207 platform) vehicles.

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

Daimler AG, Stuttgart, Germany

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

573.6(c)(2): Identification of Vehicles

Make	Line/Model	Model Year	Inclusive Dates of Manufacture
Mercedes-Benz	E-Class Coupe	2012	April 2, 2012 - June 29, 2012
	(C207 platform)		

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573.6(c)(2)(iv): Manufacturer's Name of Affected Component and Country of Origin

Affected Component - right side window curtain air bag

Takata Scheibenberger Str. 88 09481 Elterlein Germany

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

499 Mercedes-Benz E-Class Coupe (C207 platform) vehicles are potentially affected in the US.

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 100%.

573.6(c)(5): Description of Defect

DAG has determined that due to a change in the supplier's production process, the right side window curtain air bag might not deploy as intended in the affected vehicles. Specifically, a change in the stitching pattern has resulted in an improper back stitching of an end seam. In the event of a crash which would deploy the right side window curtain air bag, and in conjunction with high ambient temperatures, the right window curtain air bag could deflate more quickly than intended. This is due to the high stress generated during gas inflation that is directed on the affected seam where the right side window curtain air bag may not provide sufficient occupant protection in the event the seam opens during window curtain air bag deployment. This may increase the risk of injury during a crash. The left side window curtain air bag is not affected due to its inverted

orientation. On the left side window curtain air bag the inflating gas is not directed on the affected

seam and the window curtain air bag deploys as intended as verified through extensive testing.

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

In May 2012, the supplier first informed DAG of a potential issue with the affected right side window curtain air bags. Although the affected window curtain air bags passed all required internal standards at low and ambient temperatures, the affected right side window curtain air bags did not meet DAG's strict internal quality standards at high temperatures. In the following weeks, DAG and the supplier determined the root cause of this issue and identified the potentially affected production range of right side window curtain air bags. Further testing was conducted afterwards to assess the potential influence of this particular issue on the level of protection offered by right side window curtain air

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bags as well as to confirm the effectiveness of the measures taken in the production process to correct the issue. In early October 2012, DAG determined that a safety defect exists in the affected vehicles.

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

MBUSA will conduct a voluntary recall campaign for the subject vehicles described above. The voluntary recall campaign will be conducted to replace the right side window curtain air bag as a precautionary measure on all E-Class Coupe (C207 platform) vehicles produced between April 02, 2012 and June 29, 2012.

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

MBUSA estimates owner notification will begin in November 2012.

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

Dealers will be notified of the pending voluntary recall campaign in November 2012. The voluntary recall campaign is expected to commence in November 2012. A copy of all communications will be provided 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.

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

Sincerely,

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R. Thomas Brunner Department Manager, Vehicle Compliance and Analysis

Stephen Kraitz Compliance Engineer Vehicle Compliance and Analysis