

Mercedes-Benz USA, LLC
A Daimler Company

October 9, 2012

SENT BY E-MAIL (rmd.odi@dot.gov)

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 Noncompliance Information Report

Dear Ms. Lewis:

Pursuant to 49 CFR Part 573 and on behalf of our parent company, Daimler AG, Mercedes Benz USA, LLC (MBUSA) is filing this report with respect to a technical noncompliance issue with a motor vehicle safety standard which has been determined to exist in the vehicles identified below.

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

Daimler AG, Stuttgart, Germany

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

573.6(c)(2)(i): Identification of Vehicles

Make	Line/Model	Model Year	Inclusive Dates of Manufacture
Mercedes-Benz	GLK-Class (X204 platform)	2013	January 1, 2012- August 15, 2012

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

Approximately 2,951 Mercedes-Benz GLK-Class vehicles are potentially affected in the US.



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

All of the subject vehicles contain the noncompliance.

573.6(c)(5): Description of Noncompliance

The subject vehicles contain parking lamps that exceed the maximum designated candlepower output level provided in 49 C.F.R. § 571.108 S5.1.1.6; id. Figure 1b (listing maximum candlepower value of 125 cd for parking lamps). Due to a programming issue in the electronic control unit, the voltage in the parking lamp circuit is higher than the design voltage specification of 7volts (V) in the affected vehicles. This voltage causes the lamps to exceed the maximum value listed in FMVSS 108.

573.6(c)(6-7): Chronology of Principal Events

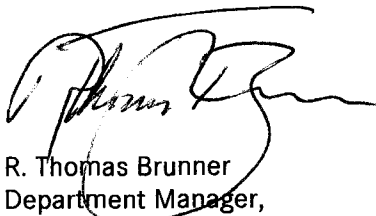
The issue was discovered in August, 2012 in unrelated vehicle testing of new light design features on a subject GLK-Class vehicle. During these tests, different light variations were tested on the vehicle. It was noticed that if the parking lamp was activated separately (which does not occur during normal nighttime driving), it appeared brighter than usual. The operation of the parking lamp was therefore subsequently further investigated, including a review of the parking lamp software coding, where it was discovered to be incorrectly programmed in the test vehicle. Additional analysis determined that with the new control software release for the GLK-class facelift, launched in July, 2012 the software-adaptation for the parking lamp was not properly implemented. The light design feature test vehicle was determined to be one of the affected vehicles. Additional testing in September, 2012 showed that the total population of subject vehicles was affected by the same lamp programming. The parking lamp functionality of the programming on these vehicles was further analyzed and found to be noncompliant with FMVSS 108.

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

MBUSA intends to file a petition for exemption from the notification and remedy requirements of the Act pursuant to 49 C.F.R. Part 556, on the basis that this noncompliance is inconsequential to motor vehicle safety.

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

Sincerely,



R. Thomas Brunner
Department Manager,
Vehicle Compliance and Analysis



Stephen Kraitz
Compliance Engineer,
Vehicle Compliance and Analysis