



Mercedes-Benz

Mercedes-Benz USA, LLC
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

SENT VIA CERTIFIED U.S. MAIL

December 21, 2012

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

Re: 49 CFR Part 573; Recall of Mercedes-Benz All Season Floor Mat

Dear Ms. Timian:

Pursuant to 49 CFR Part 573.6(10), this letter contains 3 documents (Dealer Notification, Repair Instructions, Customer Letter) that were communicated to our dealers on the above subject and will be submitted in the Mercedes-Benz USA, LLC (MBUSA) regular monthly mailing for the month of December, 2012.

Manufacturer's Campaign Identification Number
2012080006

NHTSA Recall Number
12E-028

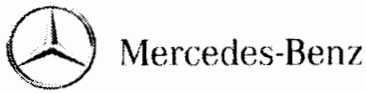
Should you have any questions, please do not hesitate to contact me at brunnert@mbusa.com.

Sincerely,

R-Thomas Brunner
Department Manager,
Vehicle Compliance and Analysis

Stephen Kraitz
Compliance Engineer
Vehicle Compliance and Analysis

Enclosure



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SERVICE

newschannel update

TO: Mercedes-Benz Dealer Principals, General Managers, Sales Managers, Service Managers, Parts Managers	FROM: Thomas Brunner, Department Manager, Vehicle Compliance and Analysis, Engineering Services
RE: Recall Campaign 2012080006 – Replace Accessory All Weather Floor Mats, If Installed, Model 166, Model Years 2012-2013	DATE: December 21, 2012

IMPORTANT RECALL INFORMATION

This Recall Campaign is being launched today and the 32,756 affected vehicles are flagged in VMI.

On Monday, August 13, 2012 dealers were notified that Mercedes-Benz USA, LLC (MBUSA) will conduct a voluntary Recall Campaign on certain accessory All Weather Floor Mats for the Model Year 2012 – 2013 ML-Class (166). Approximately 8,879 accessory All Weather Floor Mats have been sold in the United States. This notification is posted on the NHTSA web site and may generate some customer questions.

Background

The issue relates to all-weather floor mats that we began offering as an accessory on MY 2012 and 2013 ML-Class models (166). It does not involve the velour floor mats that all ML-Class vehicles have as standard equipment.

Mercedes-Benz has determined that the subject all-weather floor mat, which may have been purchased as an accessory from an authorized Mercedes-Benz dealer for use in the M-Class, may have the potential to temporarily interfere with the gas pedal of this vehicle under certain circumstances. These all-weather floor mats may not fully conform to the contour of the vehicle's floor pan as intended. In cases where the mats do not properly conform, the designed clearance between the mat and gas pedal may be reduced. In extreme cases, the possibility cannot be ruled out that the clearance could be reduced to a level where a temporary interference between the subject floor mats and the gas pedal could occur when the gas pedal is in the fully depressed position. This might lead to delayed gas pedal retraction. If this were to occur, the vehicle may not decelerate as expected when the driver's foot is lifted 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. Therefore, drivers can bring the vehicle to a stop by continuously pressing the brake pedal, even if the gas pedal is fully depressed due to interference with the all-weather floor mat.

MBUSA is conducting a voluntary recall campaign for the subject all-weather floor mats. The recall campaign will be conducted to collect the subject accessory floormats from customers who purchased them, replace the subject mats with mats that cannot interfere with the gas pedal, and provide customers with the option of a full refund if they do not want replacement all-weather mats.

Given this notice, it is a violation of Federal law for a dealer to retail the following part numbers of All Weather Floor Mat/Tray: **A1666801048 9051 & A1666801048 7J07 and BQ 668 0719 & BQ668 0720.** Any existing stock on hand must be returned immediately to your facing PDC.



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Parts - A Dealer allocation of two sets (black) per affected dealer will arrive at the dealers shortly. Dealers may order additional sets of black and brown as required, however parts are in very limited supply and should not be ordered for shelf stock or initially used for customers other than those affected by the recall. Parts replacement rate is 100%.

Owner Notification - Owner notifications will be sent approximately one week after recall launch.

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

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.

Note: 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 may cause, MBUSA 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).

Campaign No. 2012080006, December 2012

TO: ALL MERCEDES-BENZ CENTERS

SUBJECT: **Model 166**
Model Years 2012 and 2013
Replace Accessory All Weather Floor Mats, If Installed

This Recall Campaign has been initiated because Daimler AG (DAG), the manufacturer of Mercedes-Benz vehicles, has determined that the subject all-weather floor mat, which may have been purchased as an accessory from an authorized Mercedes-Benz dealer for use in M-Class (166 platform), may have the potential to temporarily interfere with the gas pedal of this vehicle under certain circumstances. The all-weather floor mats designed for the M-Class vehicle may not fully conform to the contour of the vehicle's floor pan as intended. In cases where the mats do not properly conform, the designed clearance between the mat and gas pedal may be reduced. In extreme cases, the possibility cannot be ruled out that the clearance could be reduced to a level where a temporary interference between the subject floor mats and the gas pedal could occur when the gas pedal is in the fully depressed position. This might lead to delayed gas pedal retraction. If this were to occur, the vehicle may not decelerate as expected when the driver's foot is lifted from the gas pedal, which could increase the risk of a crash.

MBUSA is conducting a voluntary recall campaign for the subject all-weather floor mats. The recall campaign will be conducted to collect the subject floor mats from customers who purchased them, replace the subject mats with mats that cannot interfere with the gas pedal, and provide customers with the option of a full refund if they do not want replacement all-weather mats.

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 repair procedure exactly as described.

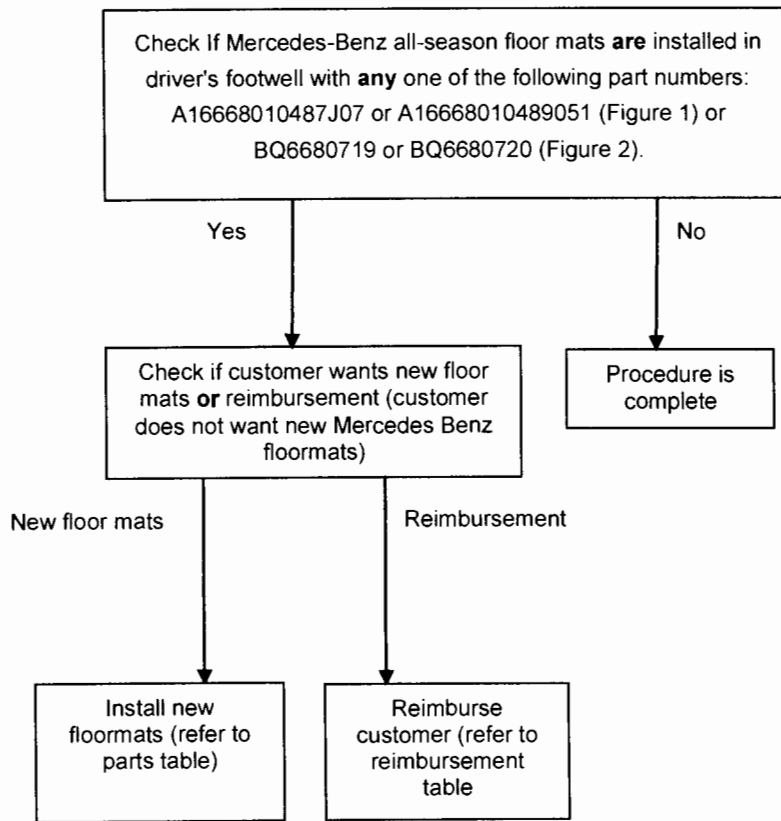
Please note that Recall and Service Campaigns **do not expire** and may also be performed on a vehicle with a vehicle status indicator.

Approximately 32,755 vehicles are involved (8,879 rubber mats and trays).

Order No. T-RC-2012080006

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.

Work process flow chart



Procedure

1. Check part number on the reverse side of the floor mat in the driver footwell (Figures 1 and 2):
 - If Mercedes-Benz all-season floor mats **are** installed in driver's footwell with **any** one of the following part numbers: A16668010487J07 or A16668010489051 (set numbers) (Figure 1) or BQ6680719 or BQ6680720 (Figure 2) proceed to step 2.
 - Note:** Original equipment velour (carpeted) floor mats DO NOT qualify for reimbursement under this campaign.
 - If the floor mats with part numbers listed above are **not** installed: Procedure is complete.
2. Check if the customer wants to have the floor mat replaced or if the customer would **rather** be reimbursed for the floor mat:
 - If the customer chooses to have the floor mat replaced, replace with a new floor mat (refer to parts table). Be sure to replace with the same color.
 - If the customer chooses reimbursement: Reimburse the customer for the floor mat, refer to customer reimbursement table on page 3 for price of the floor mat reimbursement.

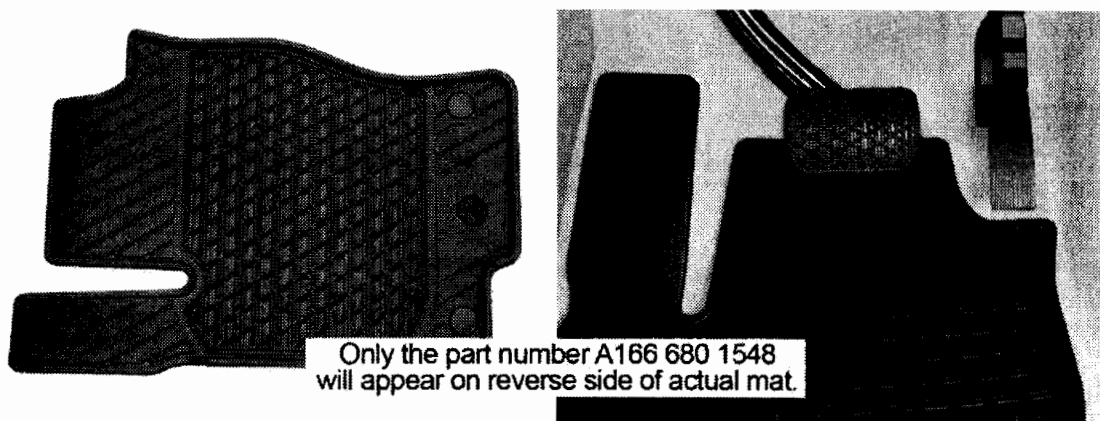


Figure 1 (Part number: A16668010487J07 or A16668010489051)

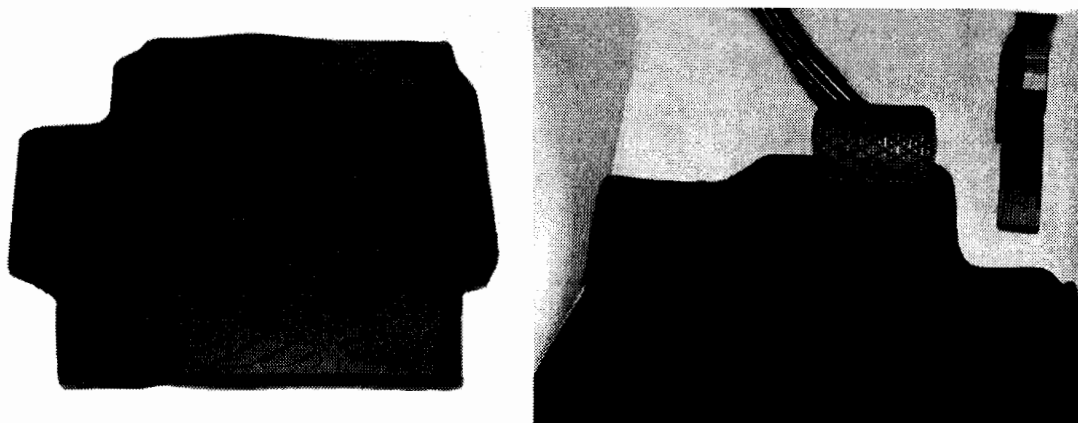


Figure 2 (Part number: BQ6680719 or BQ6680720)

Note:

- Customers must be informed that there should not be more than one floor mat installed in the footwell area and the floor mat must be installed using the provided attachment points.
Ensure that the floor mat does not interfere with the accelerator pedal's radius of movement.
- Do not remove or reimburse customers for non-Mercedes-Benz part number floor mats.
Reimbursement only for part numbers (old ones) indicated in step 1.
- Warranty claim will only be paid upon receipt of eligible driver side part number floor mat.
Dealers will not be reimbursed for ineligible or non-Mercedes-Benz part number floor mats.

Customer Reimbursement Parts Information

Qty.	Part Name	Local Purchase Number	Reimbursement Amount
1	Floor mat (refer to Figure 1)	RUB16000	\$160 (includes sales tax)
1	Floor mat (refer to Figure 2)	TRA12500	\$125 (includes sales tax)

* Please claim 1 of the above local purchase numbers to reimburse customer depending on which part is removed. Includes cost to reimburse customer for the original part and sales tax. This part will be requested by the QEC to ensure accuracy. The Dollar amount indicated is the amount to be reimbursed to the customer.

Primary Parts Information

Qty.	Part Name	Part Number	Estimated Replacement Rate
1	Floor mat, black	A1666803501 9051	25%
	Floor mat, brown	A1666803501 7J07	

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**Repair 1**

Operation: Check floor mat in driver footwell (02-7967)

Damage Code	Operation Number	Model Indicator(s)
58 980 35 8	02-7967	1A, 2A, 3A, 4A, 5A

Repair 2

Operation: Check floor mat in driver footwell (02-7967)
Replace or remove floor mat in driver footwell (02-7968)

Damage Code	Operation Number	Model Indicator(s)
58 980 35 7	02-7967	1A, 2A, 3A, 4A, 5A
	02-7968	

Note

Operation code times are subject to change. Please refer to StarTime for current labor times