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Mercedes-Benz

13V-166
(3 pages)

Mercedes-Benz USA, LLC
A Daimler Company

April 26, 2013

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 seat belt anchor fittings of the second seat row in certain 2013 Model Year Mercedes-Benz GL-Class (X166 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	GL-Class (X166 platform): GL350 BlueTEC, GL450 4MATIC, GL550 4MATIC, GL63 AMG	2013	May 15, 2012 - October 04, 2012

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

N/A

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

Approximately 272 Mercedes-Benz vehicles are potentially affected in the US.

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

The exact percentage of vehicles estimated to actually contain the defect described below is unknown.

573.6(c)(5): Description of Defect

DAG has determined that due to a change in the assembly process, one of the seat belt anchor fittings (left or right) of the second seat row in a limited number of vehicles may not have been tightened with the appropriate torque. During assembly of the seat belt anchor fittings, tightening torque and rotation angle of the bolts are recorded by power screwdrivers. Due to a malfunction of the recording software, the power screwdriver torque documentation for the second seat row anchor fittings was not properly recorded and maintained during a limited period of time. This malfunction prevents post-production confirmation of the correct torque values for this group of vehicles.

If the tightening torque of the bolt securing the seat belt anchor fitting is too low, further loosening of the bolt due to vibrations experienced while driving cannot be excluded. If this occurs, the bolting might not withstand the required loads under all circumstances, resulting in an increased risk of injury for the occupant in case of a crash.

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

In December 2012, a plant action was initiated after one vehicle with improper tightening torque at one seat belt anchor fitting of the second seat row had been discovered in the course of pre-delivery checks as part of the plant quality process. In the following weeks, DAG and the plant determined the root cause of this issue and identified the potentially affected production range of vehicles. Further evaluation was conducted afterwards to assess the potential impact of this issue on the effectiveness of the affected restraint system. In April 2013, DAG determined that a safety related defect cannot be excluded in the limited number of vehicles listed above.

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

MBUSA will conduct a voluntary recall campaign for the subject vehicles described above as a precautionary measure. The voluntary recall campaign will be conducted to check, and if necessary tighten the bolt of the seat belt anchor fittings with the appropriate torque on the affected GL-Class (X166 platform) vehicles.

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

Daimler AG estimates owner notification will begin in May 2013. Pursuant to 49 C.F.R. § 577.11(e), MBUSA does not plan to provide notice about pre-notice reimbursement to owners because all involved vehicles from model year 2013 remain covered under the new vehicle warranty.

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

Dealers will be notified of the pending voluntary recall campaign in May 2013. The voluntary recall campaign is expected to commence in May 2013. 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,


foe

Julian Soell
General Manager,
Engineering Services



R. Thomas Brunner
Department Manager,
Vehicle Compliance and Analysis