

Mercedes-Benz USA, LLC A Daimler Company

November 19, 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 fitting in certain 2014 Model Year Mercedes-Benz S-Class (222 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	S550 (222 platform)	2014	April 11, 2013 - October 14, 2013

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

TRW Automotive GmbH Industriestraße 20 D-73553 Alfdorf Germany

> Mercedes-Benz USA, LLC One Mercedes Drive P.O. Box 350 Montvale, NJ 07645-0350 Phone (201) 573-0600 Fax (201) 573-0117 www.MBUSA.com

Nancy Lewis November 19, 2013 Page 2

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

Approximately 290 Mercedes-Benz 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 less than 1%.

573.6(c)(5): Description of Defect

DAG has determined that on a limited number of S-Class vehicles (222 platform) produced between April 11, 2013 - October 14, 2013 the seat belt anchor fittings of the front seats might not be mounted correctly on the potentially affected individual vehicles. In the affected vehicles there is a possibility that the linkage between the safety belt and the cable eyelet on the front seat might not be locked sufficiently. In these affected vehicles, the connection at the seat belt anchor fitting could release under heavy loading. This may affect the restraint performance of the seat belt and result in an increased risk of injury in the event of a crash.

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

During quality assurance inspections in October, 2013, DAG discovered an incorrectly mounted seat belt anchor fitting. Initial investigations determined the root cause to be the production process employed on a limited subset of production.

The production documentation was further analyzed to determine the scope of affected vehicles. An additional evaluation was then conducted in order to assess the potential impact of this issue on the effectiveness of the subject vehicles' restraint systems. DAG decided in November 2013 that a potential defect cannot be excluded on the potentially affected vehicles.

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

MBUSA will notify dealers in November, 2013 to advise them that MBUSA will conduct a voluntary recall campaign for the subject vehicles described above as a precautionary measure to check the seat belt anchor fitting on the affected S-Class vehicles.

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

Owner notification will occur late November or early December 2013, after NHTSA has approved the draft customer letter. Pursuant to 49 C.F.R. § 577.11(e), MBUSA does not plan to provide

Nancy Lewis November 19, 2013 Page 3

notice about pre-notice reimbursement to owners since all involved vehicles remain covered under the new vehicle warranty.

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

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 for NHTSA approval.

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

The MBUSA Recall Campaign Number will be 2013110008.

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

Sincerely,

Julian Sall

Julian Soell General Manager, Engineering Services

Whohmes Timmes

R. Thomas Brunner Department Manager, Vehicle Compliance and Analysis