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Mercedes-Benz

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(3 pages)

Mercedes-Benz USA, LLC
A Daimler Company

March 28, 2014

SENT BY E-MAIL (rmd.odi@dot.gov) **AND CERTIFIED U.S. MAIL**

Ms. Nancy Lummen Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
NVS-215, Room W48-302
Washington, D.C. 20590

Re: Part 573 Noncompliance Information Report

Dear Ms. Lummen 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 recall for certain Mercedes-Benz vehicles. Specifically, Mercedes-Benz USA, LLC (MBUSA) submits this report regarding the accessibility of the ISOFIX child seat anchorages of the second seat row in certain 2014 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): GL 350 BlueTEC 4MATIC, GL 450 4MATIC, GL 550 4MATIC, GL 63 AMG	2014	November 04, 2013 - November 15, 2013

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

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

Component: Seat pan

Manufacturer: Faurecia Interior Systems Inc.
 1401 Industrial Park Drive
 Tuscaloosa, Alabama 35401

Country of Origin: United States of America

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

Approximately 69 Mercedes-Benz vehicles are potentially affected in the US.

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

The percentage of vehicles that are projected to actually contain the issues described below is unknown.

573.6(c)(5): Description of Noncompliance

The subject GL-Class (X166 platform) vehicles are equipped with a 60%/40% split second seat row and foldable seats. DAG has determined that due to a deviation in the production process at the supplier, the mount for the 60% seat pan may have been welded to the seat structure at an angle that could potentially prevent the seat pan from reaching its intended end position when fully lowered. Consequently, the accessibility of the ISOFIX child seat anchorages in the area of the seat bite may not be ensured as required in FMVSS 225.

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

In November 2013, the first tier supplier noticed seat assemblies where the 60% seat pan did not reach its intended end position when fully lowered. In the following weeks, the issue was further analysed by DAG as well as by the plant and the supplier, and the potentially affected batch of seat structures was identified. Further analysis identified the potentially affected range of vehicles. In March 2014, DAG determined that the accessibility of the ISOFIX child seat anchorages in the area of the back rest might not be ensured in the limited number of vehicles listed above. There have been no customer complaints concerning this noncompliance.

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, replace the 60% seat pan of the second seat row with a modified part on the affected GL-Class (X166 platform) vehicles. The voluntary recall campaign is expected to commence in the April to May, 2014 timeframe.

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

DAG estimates owner notification will begin in May 2014. 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 2014 remain covered under the new vehicle warranty. Dealers will be notified of the pending voluntary recall campaign in April 2014.

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): 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,



FOR J.S. 3/28/14

Julian Soell
General Manager,
Engineering Services