

April 10, 2014

14V-177 (3 pages)

Mercedes-Benz USA, LLC A Daimler Company

## SENT BY E-MAIL (rmd.odi@dot.gov) AND CERTIFIED 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 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 recall for certain Mercedes-Benz vehicles. Mercedes-Benz USA, LLC (MBUSA) submits this report regarding the tail lamps in certain 2008 - 2011 Model Year Mercedes-Benz C-Class (204) 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)(i): Identification of Vehicles

Make	Line/Model	Model Year	Inclusive Dates of Manufacture
Mercedes-Benz	C-Class (204 platform): C300, C300 4MATIC, C350, C63 AMG	2008-2011	January 26, 2007 –July 13, 2011

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

Component: Tail lamp bulb carrier

Manufacturer:	Odelo Automotive Signal Lights GmbH Mr. Wolfgang Eitel Head of Technical Quality Assurance Alfred-Schefenacker-Strasse 1	
	Germany +49 (0) 7195 581 2203	

Country of Origin: Germany

#### 573.6(c)(3): Total Number of Vehicles

Approximately 252,867 Mercedes-Benz C-Class vehicles are potentially affected in the U.S.

#### 573.6(c)(4): Percentage of Vehicles

All of the subject vehicles are potentially affected.

#### 573.6(c)(5): Description

Oxidation on the ground pin connector for the rear tail lamps of subject vehicles can result in a dimming of the tail lights or complete loss of tail lamp function. The loss of a rear tail lamp reduces the rearward visibility of subject vehicles, especially with respect to turn signal illumination. This oxidation can reduce the level of illumination below the level required for tail lamps by Federal Motor Vehicle Safety Standard (FMVSS) 108. The reduction of rear turn signal illumination can reduce the level of warning provided to following vehicles who may not be informed of the subject vehicle's intention to turn by an FMVSS 108 compliant tail lamp.

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

Based on warranty claims and limited field data concerning the loss of tail lamp function, in January 2009 the supplier performed a function test for the tail lamp bulb carrier and tail lamp connector focusing on vibration of the tail lamp connector and its potential impact on contact and temperature resistance on the ground pin. While the contact resistance varied with vibration, no temperature increase was observed, and the cause of the issue remained unknown. In 2009, MBUSA received five field reports in which a loss of tail lamp due to contact interruption between tail lamp bulb carrier and tail lamp connector or was reported. The cause for these occurrences was still unknown at that time. However, the issue was identified for further internal technical analysis. In 2010, DAG considered whether the "passivation coating" on the tail lamp bulb carrier and the tail lamp connector was a possible cause for increased contact resistance. Further testing was performed between August 2010 and December 2011 focusing on the coating. It was found that the "passivation coating" could lead to a possible higher contact re-

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sistance under certain conditions. However, it was also found that certain material combinations of the tail lamp bulb carrier and connector contact surfaces may contribute to electrochemical oxidation. As a consequence, the tail lamp bulb carriers were produced with tin coated conductive metal frame for spare parts production beginning in January 2012. In 2013, NHTSA opened PE13-026 to investigate this issue, and DAG and MBUSA responded to the PE13-026 information request in October 2013. Subsequent to the DAG/MBUSA submission, NHTSA opened EA13-008 to continue investigating tail lamp failures, and in March 2014 NHTSA issued another information request. In connection with preparation of its response to that information request, DAG decided to conduct this recall on the subject vehicles.

#### 573.6(c)(8)(i-ii): Remedy Program

MBUSA will conduct a voluntary recall campaign for the subject vehicles described above. The recall will be conducted to remedy the issue described by checking and, if necessary, replacing both tail lamp bulb carriers and connectors. Dealers will be notified of the pending voluntary recall campaign in April 2014. MBUSA estimates an interim owner notification will be mailed in June 2014. A second notification will be mailed when parts become available, which is estimated to begin in the August to September 2014 time frame. Notice of reimbursement to owners will be made in the second customer notification.

### 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,

Julian Soell General Manager, Engineering Services

cc: Jennifer Timian

Unin R. Thomas Brunner

Department Manager, Vehicle Compliance and Analys