

DAIMLER

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Washington D.C. 20590

Daimler Trucks North America
Andy Jones
Manager
Compliance and Regulatory Affairs

December 20, 2019

Chief Counsel
National Highway Traffic Safety Administration
Attention: Recall Management Division

Re: Paragraph 37 Quarterly Supplemental Assessments, Q4 2019

Dear Chief Counsel:

In Q4 2019, as a part of an escalated strategy to emphasize the importance of Takata airbag recall, DTNA continued outreach activities initiated in 2018 and 2019, targeted at maximizing the recall completion rate.

Intensive Customer Calling: DTNA continued “Intensive Customer Calling” in Q4, under this program, customers from all 50 states were contacted by DTNA employees urging them to get the recall(s) completed. DTNA is continuously reaching out to customers who have shown positive interest in airbag replacement. The current approach has resulted in a diminishing number of completed recalls. DTNA therefore is currently refreshing this approach, using different internal resource, to regain the momentum.

Geo-fencing. Geo-fencing aims owners/employees of businesses and bypass receptionists. Banner advertisement will go to digital numbers/IP addresses followed by options to click 1) ask for assistance setting up a repair 2) provide new owner or scrap information 3) owner refusal to do the recalls, or to opt out. Appropriate responses will be followed up with personal phone calls to arrange repairs. This initiative was launched in September 2019. As of now 127,300 people reached out to landing page, 321 clicked to get further detail but no one has reached out to schedule repair. DTNA therefore is planning to modify launch page to gain customers attention

Owner Incentive Program: DTNA continued the “Owner Incentive Program” in Q4 to target the remaining population under this recall, with this initiative DTNA is offering \$50 gift card to Sterling Bullet owners to get the airbag replaced. The postcards were sent out to owners in the first week of September 2018 through Fed Ex. DTNA is planning to resend postcards with graphic image via Fed Ex in January 2020. To date, we have received 45 customers request for gift card and 6 customers said they don’t need gift cards.

Mobile Repair: To facilitate mobile repair DTNA, continued collaboration with Travel center of America.

DMV Outreach: DTNA is participating in the joint OEM initiatives and has sent out letters to Sterling Bullet owners through certain state DMV's to increase awareness on Takata Airbag recall. To date, letters have been sent out to New York, Louisiana and Alabama, North Carolina owners.

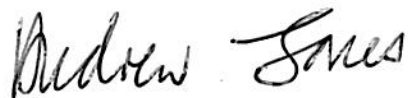
Salvage Yards: DTNA has collaborated with MBUSA to secure vehicles with an open Takata Airbag recall in Salvage Yards. This project was rolled out in mid-August 2018, and to date, DTNA has identified two vehicles in salvage yard.

Dealer Incentives: DTNA has also extended significant incentives to dealers to complete the Takata related recalls. DTNA will continue to communicate the incentives to the dealers and customers with expiration dates to create a sense of urgency to increase the number of repairs being completed.

Multi-state media outreach: DTNA is participating in Multi-state media outreach initiative to create awareness on Takata Airbag recall. The first two letters were published in first week of April in Georgia, Tennessee and North Carolina. Oklahoma and New York letters were distributed in October 2019.

Please contact me if you have any questions.

Sincerely yours,

A handwritten signature in black ink that reads "Andrew Jones". The signature is written in a cursive, flowing style.

Andrew Jones