

May 5, 2017

Mercedes-Benz USA, LLC A Daimler Company

VIA NHTSA Portal

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: NEF-107 16V081 Driver's Frontal Air Bag Inflator May Rupture

In an email dated April 13, 2017 to Mercedes-Benz USA, LLC ("MBUSA"), NHTSA reiterated that recall notification letters must be mailed to owners within 60 days of filing a Part 573 Report with NHTSA. The owner notification for the subject recall did not meet this deadline. NHTSA requested an explanation from MBUSA for the delay in notifying owners of this safety recall and what steps we will take to ensure future recall notifications are issued within 60 days.

The subject recall and 573 report was MBUSA's first involvement with the Takata DIR PSDI inflators, affecting approximately 706,000 Mercedes-Benz passenger vehicles in the United States; MBUSA's largest-volume recall to date by far. MBUSA submitted the Part 573 Report on February 9, 2016. On March 22, 2016, NHTSA emailed MBUSA that the mailing deadline was approaching. The final interim letter was approved on April 8, 2016. MBUSA started to mail the interim letters on April 12, 2016, and continued with significant volumes until all interim letters were mailed. MBUSA conveyed to the Agency that all efforts were being made to start mailing as soon as possible, and acknowledged that future large-volume mailings will include multiple printing sources to complete the mailings in an even shorter timeframe.

MBUSA continues to work diligently to meet the 60 day notification deadline for any future recalls.

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

Sincerely,

R. Momas Brunner
Department Manager,

Vehicle Compliance and Analysis