



Mercedes-Benz

Mercedes-Benz USA, LLC
A Daimler Company

May 5, 2017

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 16V335 Clutch Disk Weld may Crack

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.

MBUSA submitted the Part 573 Report on May 16, 2016 for the subject recall involving 1 vehicle. On June 20, 2016, an MBUSA Field representative was provided with the VIN, work instructions and customer contact information to work with the respective authorized Mercedes-Benz dealer on this recall. On August 4, 2016, NHTSA provided MBUSA with an email overdue notice regarding the 60 day threshold. On August 5, 2016, the undersigned and Jennifer Timian discussed the topic via phone call, where it was confirmed with MBUSA that owner notification consistent with part 577 is due for all campaigns, no matter the size. Also, while it is true that under 577.6 that a representative copy of a notification issued to only one purchaser does not have to be submitted to the agency, the notification must nevertheless occur. NHTSA also confirmed that OEMs should always be prepared to issue a mailed notification within the required 60 days no matter the vehicle population size.

MBUSA has incorporated the recommendations for low volume recalls, and will continue 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. Thomas Brunner
Department Manager,
Vehicle Compliance and Analysis

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