



Mercedes-Benz

Mercedes-Benz USA, LLC
A Daimler Company

October 25, 2010

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

Mr. Daniel C. Smith
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
NVS-200, Room W45-306
Washington, D.C. 20590

Re: Part 573 Defect Information Report—Amended and Updated Information for 10V-459

Dear Mr. Smith:

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 safety-related recall for certain Mercedes-Benz vehicles. Specifically, Mercedes-Benz USA, LLC (MBUSA) submits this report regarding the power steering system in certain 2010 - 2011 Model Year Mercedes-Benz 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	C-Class, Model 204	MY 2010	June 1, 2009 – February 28, 2010
	E-Class, Model 212	MY 2010	
	E-Class Coupe Model, 207	MY 2010	
	E-Class Cabriolet Model, 207	MY 2011	

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): Manufacturer's Name of Affected Component and Country of Origin

Affected Component - Power Steering Pump
ZF Lenksysteme GmbH
73527 Schwäbisch Gmünd
Germany

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

Approximately 85,300 Mercedes-Benz vehicles are potentially affected in the US.

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

The percentage of vehicles that are projected to actually contain the issues described below is 100%.

573.6(c)(5): Description of Defect

DAG has determined that the power steering system in the subject vehicles may fail due to the loss of power steering fluid. The connection fitting on the high-pressure power steering line at the connection to the pump did not have sufficient torque applied during the production process. Loss of torque on the connection fitting may, over time, result in the backing off of the connection fitting by no more than approximately 0.1 - 0.3 mm, due to the positioning of a clamping plate. As a result of the loss of power steering fluid, owners may not have sufficient control of the vehicle in areas, such as parking where maximum power steering is required, and could lead to a vehicle crash.

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

DAG has identified field cases containing complaints from customers stating minor loss of power steering fluid. A limited number of customers identified reduced power steering during parking. In the fourth quarter of 2009, DAG identified claims from taxi operators in Europe regarding loss of power steering fluid. As the number of claims continued in Europe, DAG undertook a program of part retrieval and inspection.

After completing a number of process and part inspections at the end of 2009 and the beginning of 2010, the company and its supplier identified the potential for an incorrect torque setting during the production process. The production process was modified at the end of February, 2010 to eliminate this potential problem. DAG continued to monitor the situation in the field. Although a small number of warranty claims have been identified in the United States that potentially could involve this situation, the company has determined that the situation may exist

in vehicles and develop over longer mileage accumulation. Accordingly, a field action was approved.

573.6(c)(8)(i): Remedy Program

MBUSA will conduct a voluntary recall campaign for the subject vehicles described above. The voluntary recall campaign will be conducted to check, and retorque the connection fitting. The O-ring seal will be exchanged as a precautionary measure in all cases where the connection fitting shows evidence of loosening.

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

MBUSA owner notification began on October 22, 2010.

573.6(c)(10): Copies of Communications with Dealers or Purchasers

Dealers were notified of the pending voluntary recall campaign and stop sale on October 5, 2010. The voluntary recall campaign commenced on October 13, 2010. A copy of all communications was provided to the agency.

573.6(c)(11): Copies of Proposed Owner Notification Letter

A copy of the owner notification was provided to and approved by the agency on October 8, 2010.

573.6(c)(12): Manufacturer's Campaign Identification Number

The MBUSA Recall Campaign Number is 2010100002.

If you or your staff have any questions, please do not hesitate to contact Mr. R. Thomas Brunner at (201) -573-2622.

Sincerely,



DAVID MCHUGH
FOR FRANK DIERTL

Frank J. Diertl
General Manager,
Engineering Services



R. Thomas Brunner
Department Manager,
Vehicle Compliance and Analysis