Mercedes-Benz USA, LLC

## 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

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 MercedesBenz 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/Cabriolet, | MY 2010-2011 |  |
|  | Model 207 |  |  |

Daniel C. Smith
October 4, 2010
Page 2

## 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 85,078 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 of the connection fitting may, over time, result in the backing off of the connection fitting by no more than approximately $0.1-0.3 \mathrm{~mm}$, 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.

After completing a number of process and part inspections, the company and its supplier identified the potential for an incorrect torque setting during the production process. The production process has been modified to eliminate this potential problem.

## 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 0 -

Daniel C. Smith
October 4, 2010
Page 3
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 estimates owner notification will begin in October, 2010.

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

Dealers will be notified of the pending voluntary recall campaign in October, 2010. The voluntary recall campaign is expected to commence in October, 2010. A copy of all communications will be provided when available.

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

A copy of the owner notification will be provided when available.

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

The MBUSA Recall Campaign Number will be provided when available.
If you or your staff have any questions, please do not hesitate to contact Mr. R. Thomas Brunner at (201)-573-2622.

Sincerely,


Frank J. Diertl General Manager, Engineering Services
 Department Manager, Vehicle Compliance and Analysis

