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Mercedes-Benz

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3 Pages

Mercedes-Benz USA, LLC
A Daimler Company

September 28, 2012

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

Ms. Nancy Lewis
Associate Administrator, Enforcement
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: Part 573 Defect Information Report

Dear Ms. Lewis:

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 refrigerant in certain 2013 Model Year Mercedes-Benz SL-Class 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	SL-Class (231 platform)	2013	December 19, 2011 – May 31, 2012

573.6(c)(2)(iv): Manufacturer's Name of Affected Component and Country of Origin

Du Pont de Nemours International S.A.
Du Pont Chemicals and Fluoroproducts
2, Chemin du Pavillon
P.O. Box 50
CH-1218 Le Grand-Saconnex, Geneva, Switzerland

Mercedes-Benz USA, LLC
One Mercedes Drive
P.O. Box 350
Montvale, NJ 07645-0350
Phone (201) 573-0500
Fax (201) 573-0117
www.MBUSA.com

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

Approximately 432 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

Manufacturers of mobile source refrigerant have over time developed a product that has a lower potential for climate impacts. Testing and evaluation of this refrigerant, R1234yf, has been conducted by numerous international institutions as well as by members of both the chemical and automotive industries. Based on these tests, R1234yf was found to be an acceptable replacement refrigerant for automotive applications. As part of its normal ongoing product testing, DAG subjected a vehicle not sold in the US to a test program designed to replicate worst-case conditions which exceed normal industry and governmental test standards. During this testing, DAG became aware that in the event of a severe frontal impact that would also cause a rupture of the refrigerant line, there is a possibility that the refrigerant may ignite in the engine compartment under these worst-case conditions. Under normal temperature and operation conditions the refrigerant does not ignite.

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

During the month of August, DAG carried out newly developed internal real-life testing involving a vehicle not sold in the US and completed the analysis and assessment in the course of September 2012. DAG concluded that ignition of the refrigerant was possible under the tested conditions. Therefore, the company will continue to use the current R134a refrigerant in Mercedes-Benz vehicles and recall vehicles using R1234yf.

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 performed in order to remove the refrigerant R1234yf, change the required hoses and replace it with the refrigerant R134a.

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

MBUSA estimates owner notification will begin in early October, 2012.

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

Dealers were notified of the voluntary recall campaign on September 25, 2012. The voluntary recall campaign is expected to commence in October, 2012. A copy of the respective 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.

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



Stephen Kraitz
Compliance Engineer,
Vehicle Compliance and Analysis