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May 10, 2018

Mr. Jonathan Morrison
Acting Chief Counsel
National Highway Traffic Safety Administration
(NCC-111), Room W41-227
1200 New Jersey Avenue, SE
West Building
Washington, DC 20590

**RE: Docket No. NHTSA-2015-0055 – Mercedes-Benz USA, LLC Request for
Corrected Launch Deadline for Model Year (MY) 2010 Mercedes-Benz C-Class
(204 platform) Vehicles**

Dear Mr. Morrison:

On behalf of our client, Mercedes-Benz USA, LLC (MBUSA), this letter requests a correction to the sufficient supply and remedy launch deadline for certain vehicles originally in Priority Group 9, specifically Model Year (MY) 2010 Mercedes-Benz C-Class (204 platform) vehicles in Zone non-A, for the passenger side airbag.

These vehicles were part of MBUSA's comprehensive extension request filed on April 5, 2017. In its April extension request, MBUSA listed both MY 2009 and MY 2010 C-Class (204 platform) vehicles in Priority Group 9 for the passenger side airbag, and stated that both MYs would be pulled forward to Priority Group 5, in order to replace the passenger side airbag at the same time the driver side airbag is replaced. This simultaneous replacement approach, MBUSA believes, will streamline the remedy process and improve recall completion rates.

The MBUSA extension request was granted as part of the Fifth Amendment to the November 3, 2015 Coordinated Remedy Order (Nov. 9, 2017) (Amendment). Pursuant to the Amendment, MY 2009 C-Class (204 platform) vehicles in Zone non-A, for the driver side airbag, are now subject to a sufficient supply and remedy launch deadline of June 30, 2018. See *id.* at ¶ 33 (Priority Group 5). MY 2010 vehicles of this description are now subject to a sufficient supply and remedy launch deadline of September 30, 2018. *Id.* (Priority Group 6).

Because MBUSA inadvertently combined MY 2009 and 2010 in its extension request, its MY 2010 C-Class (204 platform) vehicles in Zone non-A are now subject to two different deadlines: June 30, 2018 for the passenger side airbag (because this vehicle population was pulled forward into Priority Group 5), and September 30, 2018 for the driver side airbag (because this vehicle population is included in Priority Group 6). The MY 2010 C-Class (204 platform) vehicles originally in Priority

Group 9 should have been moved forward into Priority Group 6 in order to allow simultaneous driver and passenger side airbag replacements, with a remedy launch date of September 30, 2018.

In order to rectify this inadvertent inconsistency, and enable simultaneous replacement of the driver and passenger side airbags for MY 2010 vehicles, MBUSA is hereby requesting that its listing of Priority Group 9 vehicles on page 5 of its April 2017 extension request (as well as the accompanying notes indicating earlier replacement of passenger airbag modules concurrently with driver airbag modules), be corrected as follows:

Priority Group 9 NHTSA Remedy Launch Deadline: June 30, 2018						
Model Years	Make	Model	Inflator	Zone	Population	Info
2009 - 2009	Mercedes-Benz	C-Class (204 platform)	PAB	non-A	16495	a)
2010 - 2010	Mercedes-Benz	C-Class (204 platform)	PAB	non-A	16439	b)
2013 - 2013	Mercedes-Benz	SLS-Class Coupé	PAB	A	94	a)
2013 - 2013	Mercedes-Benz	SLS-Class Roadster	PAB	A	99	a)
2010 - 2010	Mercedes-Benz	E-Class Coupé	PAB	non-A	2620	b)
2010 - 2010	Mercedes-Benz	GLK-Class	PAB	non-A	14406	b)
2013 - 2013	Mercedes-Benz	C-Class (204 platform)	PAB	A	72826	
2013 - 2013	Mercedes-Benz	E-Class Cabrio	PAB	A	4782	
2013 - 2013	Mercedes-Benz	E-Class Coupé	PAB	A	4231	
2013 - 2013	Mercedes-Benz	GLK-Class	PAB	A	21486	
Total:					153478	

Notes:

- "a)" in column "info": airbag modules will be replaced in Priority Group 5, along with the respective driver airbag module.
- "b)" in column "info": airbag modules will be replaced in Priority Group 6, along with the respective driver airbag module.

Accordingly, MY 2010 Mercedes-Benz C-Class (204 platform) vehicles in Zone non-A, for the passenger side airbag, would be pulled forward into Priority Group 6, with a sufficient supply and remedy launch deadline of September 30, 2018. This will enable the driver and passenger side airbag replacements to be performed at the same time.

MBUSA respectfully requests that the launch deadline for these vehicles be corrected to September 30, 2018.

Thank you for your consideration of this request.

Sincerely,



R. Latane Montague

Attachment: Affidavit in Support of Extension Request

Cc: Stephen Hensch, Esq.
R. Thomas Brunner