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September 26, 2017

Mr. Stephen P. Wood  
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 – Daimler Vans Request for Extension of Priority Group 6 Launch Deadline Under ¶ 34 of the Third Amended Coordinated Remedy Order**

Dear Mr. Wood:

On behalf of our client, Daimler Vans, this letter requests an extension of time in which to comply with the sufficient supply and remedy launch deadline for Priority Group 6 vehicles contained in Paragraph 34 of the Third Amended Takata Coordinated Remedy Order (ACRO). The Daimler Vans vehicles included in Priority Group 6 are Model Year (MY) 2013 and 2014 Freightliner and Mercedes-Benz Sprinters in Zones A and non-A, for the driver side airbag.

As discussed with NHTSA and the Monitor team, Daimler Vans recently learned that its expected supply of Takata [ ] inflators for the remainder of 2017 would not be as robust as planned. Daimler Vans has been working with Takata for the past several weeks to increase its part supply allocation, and has had some success in improving the situation. Daimler Vans initially thought that, despite the supply disruption, it might have enough parts to launch Priority Group 6. However, based on the most recent information available and current calculations, Daimler Vans does not believe it can fully launch Priority Group 6 by the September 30, 2017 deadline.

Daimler Vans is therefore requesting that it be permitted to launch the Priority Group 6 recall in phases. Daimler Vans would launch the recall for MY 2013 vehicles first, since these are the oldest vehicles in that Priority Group. Daimler Vans believes that it will have sufficient parts in place to launch the recall for MY 2013 vehicles by late October, and requests an extension for that vehicle population to October 30, 2017. For MY 2014 vehicles, Daimler Vans is requesting an additional two and a half week extension, to November 17, 2017, in order to provide additional time to accumulate anticipated parts. Daimler Vans intends to also “flag” MY14 vehicles for dealers, in the event a MY14 owner demands a driver-side replacement prior to receiving the notification letter.

Daimler Vans believed it had a reasonable plan in place to procure a sufficient quantity of Takata [ ] inflators to launch this recall and has been following its normal ordering processes. Daimler Vans placed weekly parts orders, and, once it realized that it would not be receiving sufficient supplies, escalated this issue with Takata on August 17, 2017 (escalation through Daimler purchasing department), August 31, 2017, and September 5, 2017 (telephone conference with Takata to confirm shipment schedules for remainder of 2017), in order to increase its part allocation. Daimler Vans was able to successfully increase the number of inflators to be delivered for the remainder of 2017 from [ ] to [ ], and to move up the anticipated delivery date for the next shipment to the week of October 9, 2017.

Daimler Vans normally launches a recall with [ ] of the replacement parts available to dealers; however, in this case Daimler Vans is planning to launch the recall with approximately [ ] in order to expedite the recall launch.

The normal delivery time via airfreight from when parts leave the DAG Parts Center in Germany to when they arrive at the US Parts Center is [ ] days. Allocation to dealers takes another [ ] days. Sufficient quantities of parts for MY 2013 vehicles should be accumulated by the week of October 23, 2017, then allocated to dealers so the launch can commence the week of October 30, 2017. Daimler Vans expects to be able to accumulate sufficient additional parts to launch the full recall, including MY 2014 vehicles, by the week of November 13, 2017.

Daimler Vans respectfully requests an extension of time in which to comply with the September 30, 2017 deadline specified for Priority Group 6 in Paragraph 34 of the ACRO. Daimler Vans proposes that its deadline for acquiring a sufficient supply of parts and launching the remedy for MY 2013 vehicles in Priority Group 6 be extended to October 30, 2017, and that the deadline for MY 2014 vehicles in Priority Group 6 be extended to November 17, 2017.

Thank you for your consideration of this request. Please let us know if you need any additional information.

Sincerely,



R. Latane Montague

Attachment: Affidavit in Support of Extension Request

Cc: Stephen Hench, Esq.  
R. Thomas Brunner  
Michael D. Scott