

Mercedes-Benz USA, LLC

A Daimler Company

April 30, 2008

Mr. David Coleman National Highway Traffic Safety Administration Attention: VIN Coordinator - W43-488 1200 New Jersey Avenue, SE West Building Washington, DC 20059

Subject: Part 565.7 (c), VIN Reporting Requirements

Dear Mr. Coleman:

Mercedes-Benz USA, LLC hereby submits the VIN deciphering information for model year 2009 Mercedes-Benz and Maybach vehicles, pursuant to the requirements set forth in 49 CFR Part 565.7(c). Please note that the first 4 characters of second VIN section of E320 BLUETEC has been updated to UF22.

If you have any questions please don't hesitate to contact Dan Selke, of my staff, at 201-573-2616 (Daniel.Selke@mbusa.com).

Sincerely,

Gary Bowne

Department Manager

Product Compliance, Analysis, Safety and Emissions

Engineering Services

cc: Dr. Peter Schramm (MCG)

VIN submission File

Mercedes-Benz and Maybach Vehicle Identification Number Attributes for Model Year 2009 (April 30, 2008) - Page 1 of 6

WMI	First 4 Characters of Second VIN Section	Line	Series	Body Type	Engine Type
WDB	SK71	230 (SL-Class)	SL550	2-door Convertible	5.5 Liter, V-Type 8 cyl., Gasoline
WDB	SK77	230 (SL-Class)	SL600 Bi-T	2-door Convertible	5.5 Liter, V-Type 12 cyl., Gasoline
WDB	SK70	230 (SL-Class)	SL63 AMG	2-door Convertible	6.2 Liter, V-Type 8 cyl., Gasoline
WDB	SK79	230 (SL-Class)	SL65 AMG	2-door Convertible	6.0 Liter, V-Type 12 cyl., Gasoline
WDB	SK79	230 (SL-Class)	SL65 AMG Black Series	2-door Convertible	6.0 Liter, V-Type 12 cyl., Gasoline
WDB	WK54	171 (SLK-Class)	SLK300	2-door Convertible	3.0 Liter, V-Type 6 cyl., Gasoline
WDB	WK56	171 (SLK-Class)	SLK350	2-door Convertible	3.5 Liter, V-Type 6 cyl., Gasoline
WDB	WK73	171 (SLK-Class)	SLK55 AMG	2-door Convertible	5.5 Liter, V-Type 8 cyl., Gasoline
WDB	UF22	211 (E-Class)	E320 BLUETEC	4-door Sedan	3.0 Liter, V-Type 6 cyl., Diesel
WDB	UF56	211 (E-Class)	E350	4-door Sedan	3.5 Liter, V-Type 6 cyl., Gasoline
WDB	UF87	211 (E-Class)	E350	4-door Sedan 4 MATIC	3.5 Liter, V-Type 6 cyl., Gasoline
WDB	UF72	211 (E-Class)	E550	4-door Sedan	5.5 Liter, V-Type 8 cyl., Gasoline
WDB	UF90	211 (E-Class)	E550	4-door Sedan 4 MATIC	5.5 Liter, V-Type 8 cyl., Gasoline
WDB	UF77	211 (E-Class)	E63 AMG	4-door Sedan	6.2 Liter, V-Type 8 cyl., Gasoline
WDB	UH87	211 (E-Class)	E350	4-door Station Wagon 4 MATIC	3.5 Liter, V-Type 6 cyl., Gasoline
WDB	UH77	211 (E-Class)	E63 AMG	4-door Station Wagon	6.2 Liter, V-Type 8 cyl., Gasoline
WDD	DJ72	219 (CLS-Class)	CLS550	4-door Coupe	5.5 Liter, V-Type 8 cyl., Gasoline
WDD	DJ77	219 (CLS-Class)	CLS63 AMG	4-door Coupe	6.2 Liter, V-Type 8 cyl., Gasoline
WDD	GF54	204 (C-Class)	C300	4-door Sedan	3.0 Liter, V-Type 6 cyl., Gasoline
WDD	GF81	204 (C-Class)	C300	4-door Sedan 4 MATIC	3.0 Liter, V-Type 6 cyl., Gasoline
WDD	GF56	204 (C-Class)	C350	4-door Sedan	3.5 Liter, V-Type 6 cyl., Gasoline
WDD	GF77	204 (C-Class)	C63 AMG	4-Door Sedan	6.2 Liter, V-Type 8 cyl., Gasoline

Mercedes-Benz and Maybach Vehicle Identification Number Attributes for Model Year 2009 - Page 2 of 6

WMI	First 4 Characters of Second VIN Section	Line	Series	Body Type	Engine Type
WDB	TJ56	209 (CLK-Class)	CLK350	2-door Coupe	3.5 Liter, V-Type 6 cyl., Gasoline
WDB	TJ72	209 (CLK-Class)	CLK550	2-door Coupe	5.5 Liter, V-Type 8 cyl., Gasoline
WDB	TK56	209 (CLK-Class)	CLK350	2-door Convertible	3.5 Liter, V-Type 6 cyl., Gasoline
WDB	TK72	209 (CLK-Class)	CLK550	2-door Convertible	5.5 Liter, V-Type 8 cyl., Gasoline
WDB	TK77	209 (CLK-Class)	CLK63 AMG	2-door Convertible	6.2 Liter, V-Type 8 cyl., Gasoline
WDD	EJ86	216 (CL-Class)	CL550	2-door Coupe 4 MATIC	5.5 Liter, V-Type 8 cyl., Gasoline
MDD	EJ77	216 (CL-Class)	CL63 AMG	2-door Coupe	6.2 Liter, V-Type 8 cyl., Gasoline
WDD	EJ76	216 (CL-Class)	CL600 Bi-T	2-door Coupe	5.5 Liter, V-Type 12 cyl., Gasoline
WDD	EJ79	216 (CL-Class)	CL65 AMG	2-door Coupe	6.0 Liter, V-Type 12 cyl., Gasoline
WDD	NG71	221 (S-Class)	S550	4-door Sedan	5.5 Liter, V-Type 8 cyl., Gasoline
WDD	NG86	221 (S-Class)	S550	4-door Sedan 4 MATIC	5.5 Liter, V-Type 8 cyl., Gasoline
WDD	NG76	221 (S-Class)	S600 Bi-T	4-door Sedan	5.5 Liter, V-Type 12 cyl., Gasoline
WDD	NG77	221 (S-Class)	S63 AMG	4-door Sedan	6.2 Liter, V-Type 8 cyl., Gasoline
WDD	NG79	221 (S-Class)	S65 AMG	4-door Sedan	6.0 Liter, V-Type 12 cyl., Gasoline
WDB	VF78	240 (Maybach)	57	4-door Sedan	5.5 Liter, V-Type 12 cyl., Gasoline
WDB	VF79	240 (Maybach)	57S	4-door Sedan	6.0 Liter, V-Type 12 cyl., Gasoline
WDB	VG78	240 (Maybach)	62	4-door Sedan	5.5 Liter, V-Type 12 cyl., Gasoline
WDB	VG79	240 (Maybach)	628	4-door Sedan	6.0 Liter, V-Type 12 cyl., Gasoline
WDD	AJ76	199 (SLR)	SLR McLaren	2-door Convertible	5.5 Liter, V-Type 8 cyl., Gasoline

Mercedes-Benz and Maybach Vehicle Identification Number Attributes for Model Year 2009 - Page 3 of 6

Fifth Character of Second VIN Section	Driver	Front Passenger	Outboard Rear	Center Rear	
F (Lines 171, 199, 230, Line 209 Convertibles)	ETD* with Type-2 Belts, Air Bag, Knee Bolster or Knee Bag, Head-Thorax Side Air Bag	ETD* with Type-2 Belts, Air Bag, Knee Bolster or Knee Bag, Head-Thorax Side Impact Air Bag	ETD* withType-2 Belts**	N/A**	
G (Line 209 Convertibles)	ETD* with Type-2 Belts, Air Bag, Knee Bolster, Head-Thorax Side Impact Air Bag	ETD* with Type-2 Belts, Air Bag, Knee Bolster, Head-Thorax Side Impact Air Bag	ETD* with Type-2 Belts, Side Impact Air Bag	N/A***	
H (Line 209 Coupes)	ETD* with Type-2 Belts, Air Bag, Knee Bolster, Side Impact Air Bag, Window Curtain Air Bag	ETD* with Type-2 Belts, Air Bag, Knee Bolster, Side Impact Air Bag, Window Curtain Air Bag	ETD* with Type-2 Belts, Window Curtain Air Bag**	N/A***	
J (Line 240, Coupes of Line 209)	ETD* with Type-2 Belts, Air Bag, Knee Bolster, Side Impact Air Bag, Window Curtain Air Bag	ETD* with Type-2 Belts, Air Bag, Knee Bolster, Side Impact Air Bag, Window Curtain Air Bag	ETD* with Type-2 Belts, Window Air Bag Side Impact Air Bag	N/A***	
X (Lines 211, 216, 219, 221, 204)	Driver and front passenger air bag as well as T and/or seat belt devices as standard or optional		evice and load limiter. Addition	onal air bags	

Emergency Tensioning Device (retractor or buckle);

Plant Designation Codes for WDB: A, B, C, D = Sindelfingen; E = Juiz de Fora (Brazil); F, G, H = Bremen; T = Osnabrück;

Plant Designation Code for WDC: X = Graz (Austria);

Plant Designation Codes for WDD: **A** = Sindelfingen; **F**, **G**, **H** = Bremen; **J** = Rastatt; **M** = Woking (McLaren, GB); **R**, **S** = East London (South Africa)

4-Matic = All Wheel Drive

^{**} Lines 230 (SL550, SL600, SL63 AMG, SL65 AMG, SL65 AMG "Black Series"), 209 (CLK63 AMG), 171 (SLK300, SLK350, SLK55 AMG) and 199 (SLR McLaren) have only two front designated seating positions;

Lines 209 Convertible (CLK350, CLK550, CLK63 AMG), 209 Coupe (CLK350, CLK550), 216 (CL550, CL63 AMG, CL600 Bi-T, CL65 AMG), 219 (CLS550, CLS63 AMG) and 240 (Maybach 57S, Maybach 62, Maybach 62S) have only two rear designated seating positions.

Mercedes-Benz and Maybach Vehicle Identification Number Attributes for Model Year 2009 - Page 4 of 6

WMI	First 4 Characters of Second VIN Section	Line	Series	Body Type	Engine Type
4JG	BB25	164 (M-Class)	ML320 BLUETEC	4-door MPV 4 MATIC	3.0 Liter, V-Type 6 cvl., Diesel
4JG	BB86	164 (M-Class)	ML350	4-door MPV 4 MATIC	3.5 Liter, V-Type 6 cyl., Gasoline
4JG	BB56	164 (M-Class)	ML350	4-door MPV	3.5 Liter, V-Type 6 cyl., Gasoline
4JG	BB75	164 (M-Class)	ML550	4-door MPV 4 MATIC	5.5 Liter. V-Type 8 cvl Gasoline
4JG	BB77	164 (M-Class)	ML63 AMG	4-door MPV 4 MATIC	6.2 Liter, V-Type 8 cyl., Gasoline
4JG	CB25	251 (R-Class)	R320 BLUETEC	4-door MPV 4 MATIC	3.0 Liter, V-Type 6 cyl., Diesel
4JG	CB65	251 (R-Class)	R350	4-door MPV 4 MATIC	3.5 Liter, V-Type 6 cyl., Gasoline
4JG	BF25	164 (GL-Class)	GL320 BLUETEC	4-door MPV 4 MATIC	3.0 Liter, V-Type 6 cyl., Diesel
4JG	BF71	164 (GL-Class)	GL 450	4-door MPV 4 MATIC	4.6 Liter, V-Type 8 cyl., Gasoline
4JG	BF86	164 (GL-Class)	GL 550	4-door MPV 4 MATIC	5.5 Liter, V-Type 8 cyl., Gasoline
WDC WDC	YR36 YR71	463 (G-Class) 463 (G-Class)	G550 G55 AMG	4-door MPV 4 MATIC 4-door MPV 4 MATIC	5.5 Liter, V-Type 8 cyl., Gasoline 5.5 Liter, V-Type 8 cyl., Gasoline

Gross Vehicle Weight Rating (GVWR)

Fifth Character of Second VIN Section	Gross Vehicle Weight Rating Class	
E (Lines 164, 251, 463)	Greater than 2722 kg to 3175 kg (6001 lbs to 7000 lbs)	

Plant Designation Code for 4JG (ML-, GL- and R-Class): A = Vance (USA, AL)

Plant Designation Code for WDC (G-Class): X = Graz (Austria)

4-Matic = All Wheel Drive

VIN Explanation

Model Year 2008 S550 \	<u>/IN</u>	<u>WDD</u>	NG71	<u>X 5</u>	8 /	<u>000000</u>
Manufacturer's Code						
Model Type						
Restraint System						
Check Digit						
Registration Year]	
Plant Codes (WDB):	A,B,C,D = Sindelfingen E = Juiz De Fora (Brazil) F,G,H = Bremen T = Osnabruek					
Plant Code (WDC):	X = Graz (Austria)				1	
Plant Codes (WDD):	A = Sindelfingen F,G,H = Bremen J = Rastatt M = Woking (UK) - SLR McLaren R, S = East London (South Africa)					
Plant Code (4JG):	A = Vance, Alabama (US)					
Sequential Serial Numb	er (6 digits) ————					

Chassis Explanation

MY08 S550 chassis no.	corresponding to VIN WDD	NG71X58A000000	WDD 221	<u>171</u> <u>1</u>	A 000000
Manufacturer Code -			_		
Model (3 digits)*					
Body type (3 digits)* * together = Baumus	ster (Model Designation)		-	_	
Left hand drive = 1 / R	Right hand drive = 2				
Plant Codes (WDB):	A,B,C,D = Sindelfingen E = Juiz De Fora (Bra F,G,H ≈ Bremen T = Osnabruek	azil)			
Plant Code (WDC):	X = Graz (Austria)				
Plant Codes (WDD):	A = Sindelfingen F,G,H = Bremen J = Rastatt M = Woking (UK) – Si R, S = East London (So	LR McLaren uth Africa)		.	
Plant Code (4JG):	A = Vance, Alabama	(US)			
Serial Number (always	s 6 digits)				
*Baumuster codes:					
164 = M 164 = GL 171 = SLK 199 = SLR McLar	204 = C 209 = CLK 211 = E en 216 = CL	219 = CLS 221 = S 230 = SL 240 = Maybach	251 = 463 =		