

**MBUSA  
Theft-  
Relevant  
Parts Policy**

May 4

**2017**

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Issued by the Dealer Assistance Center

# MBUSA Theft-Relevant Parts Policy

Issued Date: January 30, 2015

<b>Policy Profile</b>	
Short Title	Theft-Relevant Parts (TRP) Policy
Policy Number	TRP Policy dated May 4, 2017
Purpose of Policy/Summary	This policy defines the process required for acquiring parts identified as parts that may be required to steal a vehicle and/or to give a vehicle a new identity.
Scope of Application	This policy applies to all companies.
Explanation on Scope of Application	Dealers are required to provide verified documentation before fulfillment of an order identified as TRP.
Period of Validity of this Version	January 30, 2015 – December 31, 2019
Last Revision of this Version	May 4, 2017
Approval	Lisa Rosenfeld
Topic	Compliance
Policy Owner	Paul Nitsche, DM – Dealer Assistance Center
Contact Person	Keith Luther, Supervisor – Parts Technical
Documentation	Published on NetStar and PAC websites
Documents	TRP Order Form (MBUSA-137754962792)  Star Bulletin S-B-80.57/62b, dated January 26, 2015 – Ordering a Replacement or Additional Key
Further Applicable Regulations	
Changes to Previous Version	Page 9, Policy Item #7: Policy Audits – Revised penalty parameters; May 4, 2017

# MBUSA Theft-Relevant Parts Policy

Issued Date: January 30, 2015

<b>Applies to:</b> MBUSA Dealers	<b>Issued by:</b> Dealer Assistance Center
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## 1. Definitions

### A. Theft-Relevant Parts (TRP)

TRPs are parts that may be required to steal a vehicle and/or to give a vehicle a new identity (see list of TRPs below for definition). The components listed below (series production parts and spare parts) retain their TRP status permanently. Only the current DAS designations are listed in the following listing. Regardless of what the list contains, all parts marked with the TRP and Theft-Relevant Information (TRI) identifiers in the documentation systems and Paragon, in compliance with the procedural instructions shall be considered theft-relevant.

- Electronic vehicle key
- Electronic steering lock (ELV, ESL, ESCL)
- Electronic ignition switch (EZS/EIS) and workshop key for personalization
- Electronic ignition switch with integrated central gateway (EZS/ZGW, EIS/CGW)
- Electronic selector lever module (EWM/ESM)
- Vehicle-related plates, identification plate, production plate, visible VIN plate, including base material
- Transmission control unit (VGS, TCM)
- Direct shift module (DSM, ISM)
- Bodies and body sections/parts for placement of the vehicle identification number
- Engine control unit (MSG, MCM)
- Power electronics for electric drive with DAS (TUBE)
- Hybrid and e-drive control unit (EMx, ME2)
- Belt-driven or integrated starter-alternator (RSG, ISG) for DAS4
- Locking sets and mechanical keys

### B. Theft-Relevant Information (TRI)

TRI is information that may be required to steal a vehicle and/or to give a vehicle a new identity (see list of TRI below for definition). It includes the following:

- Locking data record
- Initialization data
- Personalization data
- Disable/enable information

## 2. Theft-Relevant Parts Documentation and Record Keeping

It is the dealer's responsibility to verify the required documentation before accepting any order for, or delivering, a TRP. This precaution is necessary to safeguard our customers' valuable properties and minimize your liability exposure. Failure to adhere to these requirements can expose you, your employees and your dealership to criminal or civil liability in cases of theft or fraud. For these reasons, it is absolutely essential that all personnel adhere to the following documentation process.

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## 2. Theft-Relevant Parts Documentation and Record Keeping (continued)

Theft-Relevant Parts may only be ordered by the vehicle owner or his/her authorized representative or authorized Mercedes-Benz or Freightliner dealerships completing a vehicle repair.

TRP orders for any vehicle not physically located within the USA cannot be accepted. Instead, customers should be referred to the Mercedes-Benz or other Daimler related service organization in the country where the vehicle is located.

For vehicles which were not originally distributed or sold by Mercedes-Benz USA, LLC ("MBUSA") or Daimler Vans USA, LLC ("DVUSA"), but reside in the USA, additional documentation requirements may apply when placing orders for TRPs (and any other spare parts) for these non-USA vehicles. All TRP transactions must be documented on the TRP form along with the necessary supporting documentation.

### A. TRP Documentation for the Vehicle Owner

When an order for a TRP is placed by the vehicle owner, the following documents must be presented:

- The original of the vehicle registration, title or any ownership document, which would be accepted by a Dept. of Motor Vehicles to issue a title.
- The original of the vehicle owner's government issued driver/operator license or passport. (For verification purposes only; do not photo copy or retain documents.)

### B. TRP documentation for the Authorized Representative of the Vehicle Owner

When an order for a TRP is placed by an authorized representative of the vehicle owner, the following documents must be presented:

- The original of the vehicle registration, title or any ownership document, which would be accepted by a state motor vehicle agency to issue a title.
- The original of the authorized representative's government issued driver/operator license with photo or passport.
- An original document authorizing the representative to act on behalf of the vehicle owner.
- Original or photocopy of the vehicle owner's government issued driver/operator license with photo or passport. (For verification purposes only; do not photo copy or retain document.)

An authorized representative may be:

1. A private citizen or family member acting on behalf of the owner
2. Independent workshop acting on behalf of their customer
3. An employee acting on behalf of their employer
4. A government official acting on behalf of their agency or department
5. An association member acting on behalf of their association.

An authorization letter must come from someone authorized by the company, agency or association to act on its behalf, and include a copy of their personal identification.

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## 2. Theft-Relevant Parts Documentation and Record Keeping (continued)

### C. TRP Documentation for Dealership Employees

When an order for a TRP is placed by a dealership employee for the purpose of repairing a dealer owned vehicle presented for service, or completing the key set for unsold vehicles (new or used), the following documentation must be presented:

- A valid Repair Order authorized by the vehicle General Manager or Sales Manager, with the TRP clearly noted.
- A legibly completed TRP form signed by the requesting employee and delivering employee.
- Personnel identification of dealer employee does not need to be presented.

### D. TRP Documentation for Independent Service Provider (ISP) Participating in the Secure Data Release Model (SDRM) Registry

Theft-relevant parts as a matter of policy should only be installed at authorized Mercedes-Benz or Freightliner workshops, certain exceptions apply (see Section 3C). When an order for a TRP is placed by an Independent Service Provider (ISP), the following documentation must be presented:

- Email authorization document that is received after the request is submitted through [www.startekinfo.com](http://www.startekinfo.com)
- VSP Registry Positive ID Authorization Form D-1 (acts as an authorization letter)
- Copy of the vehicle registration, title or any ownership document, which would be accepted by a Dept. of Motor Vehicles to issue a title
- Original or photocopy of the ISP government issued driver/operator license with photo or passport. (For verification purposes only; do not photo copy or retain document.)
- A valid repair order with the TRP repair clearly noted.

For more information on the SDRM registry and how to become a Vehicle Security Professional (VSP), please visit [www.nastf.org](http://www.nastf.org) → Locksmith/Vehicle Security Information.

### E. TRP Verification Process

The dealership employee must verify that the person presenting the documents is in fact the person identified by the documents. There must be a clear match between the identification documents and ownership documentation and the person ordering/receiving the TRP.

### F. TRP Form and Archiving

The TRP form is an essential part of the workshop, customer and ISP process which provides a procedural guideline for the proper handling of TRP transactions and should be completed as instructed.

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## 2. Theft-Relevant Parts Documentation and Record Keeping (continued)

### F. TRP Form and Archiving

The fully completed and signed TRP form together with all required documents (letter of authorization, vehicle documents, and repair order, etc.) shall be archived in paper form and kept in a secure location for a period of 6 years. Special consideration shall be given to the repair order. Where relevant, the repair order shall be archived in line with the TRP form retention requirement. Legible archiving by means of electronic scanning is also possible. All files are subject to audit at any time, and must be available for presentation to representatives of MBUSA or other Daimler related entities or law enforcement authorities at any time for the entire retention period.

## 3. Mercedes-Benz Workshop and Independent Service Provider (ISP) Ordering Processes

Irrespective of which TRP order process is used, vehicle referencing is mandatory for processing TRP and TRI within the workshop and customer process. This ensures a direct match between the vehicle owner/representative and his/her vehicle and between the TRP and TRI requirements and the vehicle identification number (FIN/VIN).

### A. Mercedes-Benz or Freightliner Workshop Process for TRP Key (DAS)

Particular emphasis shall be placed on ensuring the reliability of TRP handling procedures, with special focus given to the electronic vehicle key and their mechanical vehicle key. Vehicle keys shall in all cases be taken into operation on the vehicle and tested for proper functioning. For Drive Authorization Systems (DAS), the key test on the vehicle shall comprise both the mechanical and electronic opening function and the release of the immobilizer when the engine is started. The customer shall be informed that vehicle keys must be synchronized with the vehicle at the dealership by an authorized individual (service/workshop personnel) for proper operation. If this is not possible, authorized dealer personnel shall conduct the above procedure locally on the vehicle. All documentation process remains in effect for this local repair type.

During the workshop key ordering process, the following documentation must be collected for TRP key ordering:

- Customer and vehicle documentation as listed in section 2 A/B of this policy
- Valid Repair Order
- Completed TRP form

#### i) Process for Ordering Keys when No Keys are Available

Dealer must create a software case with the User Help Desk (UHD) by opening an XSF ticket and attach the registration form acknowledging that the vehicle is present at the dealership. The form, OF80.57-P-3000-01A, is available on the PAC website under the Program & Policies tab.

Once the completed documents are received, UHD will inform the dealer when the keys can be ordered for the vehicle. When the keys are received, they can be programmed as normal; however, the tracks for the lost keys must be blocked in order to comply with the TRP policy. A corresponding note must be made on the Repair Order if the customer declines the recommended repair procedure for keys.

**Important Note:** It is prohibited for to resell un-programmed vehicle keys or mechanical key blanks. These parts are solely for use in the Mercedes-Benz workshop and cannot be sold over the counter.

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## 3. Mercedes-Benz Workshop and Independent Service Provider (ISP) Ordering Processes (continued)

### B. Mercedes-Benz or Freightliner Workshop Process for DAS Components, other than Keys

Theft-relevant parts as a matter of policy should only be installed at authorized Mercedes-Benz or Freightliner workshops, certain exceptions apply. The replacement of TRP components shall be recorded on a repair order as documented proof that the parts were turned over to the customer (entitled customer or authorized representative) at an authorized Mercedes-Benz workshop and that they were installed in the vehicle. Taking components into service that were purchased elsewhere and brought in by the customer to complete the repair is prohibited. The separate legitimization can be omitted if there is an existing workshop order for these components.

The components that apply to the requirements in this section are:

- Electronic steering lock (ELV, ESL, ESCL)
- Electronic ignition switch (EZS/EIS) and workshop key for personalization
- Electronic ignition switch with integrated central gateway (EZS/ZGW, EIS/CGW)
- Electronic selector lever module (EWM/ESM)
- Vehicle-related plates, identification plate, production plate, visible VIN plate, including base material
- Transmission control unit (VGS, TCM)
- Direct shift module (DSM, ISM)
- Engine control unit (MSG, MCM)
- Power electronics for electric drive with DAS (TUBE)
- Hybrid and e-drive control unit (EMx, ME2)
- Belt-driven or integrated starter-alternator (RSG, ISG) for DAS4
- Locking sets and mechanical keys
- If an updated threat analysis warrants the addition of further TRP, these shall be protected as well

Completion and archiving of the TRP form for repair types listed above can be fully waived under the following conditions (does not apply to keys, locking sets, key track disabling/enabling):

1. A valid repair order along with customer information is completed and the repair will be carried out in the authorized workshop.
2. The DAS components are properly listed and identified by part number on the customer/repair order.
3. The customer/repair order shall be archived for at least 6 years in line with the TRP form retention requirement.
4. The traceability to the chassis number is ensured.  
Example: For a TRP audit pertaining to a certain chassis number, please provide the repair order on which the installation of a DAS component was traceably documented.
5. The traceability to the part number is ensured.  
Example: For a TRP audit pertaining to a certain DAS component with a particular part number, please provide all the repair orders/chassis numbers on which the component was installed within a particular time period.

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## 3. Mercedes-Benz Workshop and Independent Service Provider (ISP) Ordering Processes

### B. Mercedes-Benz or Freightliner Workshop Process for DAS Components, other than Keys (continued)

If compliance with one of the items 1 to 5 above cannot be ensured, the TRP form shall be completed and archived in accordance with applicable instructions.

### C. Independent Service Provider Process (ISP)

This ordering process provides a secure ordering channel for those ISPs that are enrolled in the NASTF Vehicle Security Professional (VSP) Registry. Authorized Mercedes-Benz dealers are able to sell the following TRP parts to ISPs under the following conditions:

- ISP must be a member of NASTF VSP registry
- ISP must submit TRP order request through the Mercedes-Benz STAR TekInfo website under TRP Ordering Information. The ISP will have the opportunity to choose which dealer to send the request to
- Order request will be transmitted to the Parts Manager's inbox which is located on the home page of NetStar
- The dealer and the ISP should work out the terms and conditions prior to the dealer placing the order in the Mercedes-Benz or Freightliner parts ordering system (Paragon)
- The ISP must provide the dealer with all necessary documentation (see Section 2D) before taking possession of the TRP part
- Dealer personnel must make sure that there is a clear match with the VSP that ordered the part and the person that is signing for it at the dealer

Following are the part descriptions for parts that can be sold to VSPs. Actual part numbers will vary based on the vehicle's application. An example of each part is provided for identification purposes only.

- Electronic steering lock (ELV, ESL, ESCL) e.g., A208 462 04 30 / A 037 545 16 32
- Electronic ignition switch (EZS/EIS) and workshop key for personalization e.g., A 211 545 31 08
- Electronic ignition switch with integrated central gateway (EZS/ZGW, EIS/CGW) e.g., A 164 545 16 00
- Electronic selector lever module (EWM/ESM) e.g., A 220 267 33 24
- Transmission control unit (VGS, TCM) e.g., A 000 270 17 00 & A 220 270 31 06
- Direct shift module (DSM, ISM) e.g., A 000 270 33 52
- Engine control unit (MSG, MCM) e.g., A 278 900 13 00

Other TRPs not listed in this section may be sold over the counter without prior authorization through the VSP Secure Data Release registry. The document process in Section 2D of this policy must be followed; the email notification authorization form would be the only document required in this case.



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## 4. Handling Vehicle Keys

A fundamental rule is that when any vehicle is received, the keys that are handed in for customer vehicles, new vehicles, demonstration vehicles, used vehicles, hired vehicles and the company's own vehicles must be tested to ensure that they function in the respective vehicle. Non-functioning keys must be determined in the presence of the person handing them in and recorded in writing, with the signature of both the person handing in the key and the person accepting the key.

If a key is lost by the customer, or while the vehicle is in the care of an authorized dealership, the key track(s) in question must be disabled immediately and rendered inoperative by procuring and programming a replacement for the missing key. The complete mechanical lock set must be replaced to ensure vehicle security. The customer must be informed of the repair. A corresponding note must be made on the repair order if the customer declines the recommended repair procedure for keys.

## 5. Storage of Undelivered TRPs, Handling of Faulty or Unneeded TRPs

Keys and other TRPs received by the dealer and awaiting installation or delivery must be stored in a secure location with limited and controlled access. Dealers must maintain control of the on hand inventory of all uninstalled TRP parts at all times.

When a TRP is to be replaced, the old parts which have been removed are not to be handed over to the customer or the customer's representative. The customer is to be informed of this prior to acceptance of the order. If the customer insists on being given the old part (customer-pay only), receipt of the part must be acknowledged by the customer in writing on the repair order.

For quality analysis, the Quality Evaluation Center (QEC) can request TRPs replaced under warranty for evaluation. TRPs requested to be returned to MBUSA or DVUSA must be sent using a traceable method.

All special order TRPs that are not collected by the Customer and all old TRP parts removed for repair purposes, for which return is not planned, must be destroyed and rendered completely inoperable and/or unusable by the dealer, this destruction must be recorded on the TRP form.

## 6. Important Notes

Keys ordered by a dealer cannot be drop-shipped to a third party location.

Any part that is uniquely coded to the vehicle is not returnable for credit; therefore, the dealer should make every effort to deliver the ordered part to the customer.

If you encounter operational problems with a key or lock from the Fort Worth Key & Lock Site, please complete a Quality Control Sheet and return it with the respective key or lock. The Key & Lock Site will acknowledge the report and advise the corrective action to be taken.

It is prohibited for to resell un-programmed vehicle keys or mechanical key blanks. These parts are solely for use in the Mercedes-Benz workshop and cannot be sold over the counter.

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## 7. Policy Audits

MBUSA or DVUSA will randomly select dealers and TRP orders for TRP process review. Selected dealers will receive a written listing of five TRP purchases transacted by the dealer and will have 10 business days to respond in writing and provide the necessary TRP documentation. MBUSA or DVUSA will review the TRP documentation and will outline the corrective action that is needed.

The following corrective actions will be applied for non-conformance of the policy:

- **First Offense** - The dealer will be assessed a **\$500** administrative fee by MBUSA or DVUSA where the TRP process was not followed.
- **Second Offense** - The dealer will be assessed a **\$1,000** administrative fee by MBUSA or DVUSA where the TRP process was not followed.
- **Third Offense** - The dealer will be assessed a **\$5,000** administrative fee by MBUSA or DVUSA where the TRP process was not followed.


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## Annex 2 – TRP Order Form (MBUSA-137754962792)

This is a sample of the TRP Acknowledgement Form, MBUSA-137754962792. Always download the latest version of this form before using it. This form can be found on the PAC website under the Link, *Programs & Policies*.

MBUSA-137754962792,  
January 28, 2015, Version 5


Mercedes-Benz

### TRP Form Sheet

TRP Ordering, Order Number (Repair Order)	Requester Workshop	Dealer Number	Date
License Plate Number:	Vehicle Identification Number (VIN):		

\* **Legitimization of Authorized Customer:** Recording of data from country-specific identification document, also applies to authorization. Comparison to country-specific vehicle document or deregistration notice for deregistered or decommissioned vehicles. Not applicable for repair order with the exception of keys, locking set, enabling and disabling of track.

Last Name, First Name/Company, Name:	ID Number:	Issuing Authority:	
State:	Country:	Date of Birth:	Valid to: Date Issued:
Place of residence, street/address of company office or headquarters:			

Name and address match information in vehicle document     
  Different address on vehicle document due to relocation

\* **Legitimization of Delegate:** Recording of data from country-specific identification document

**Authorization:** checked and complete (last name, first name, address, validity date/period, purpose, date, signature of authorized customer, last name, first name of delegate, when compared to ID (original/copy) and vehicle document (original) of authorized customer

Last Name, First Name:	ID Number:	Issuing Authority:	
State:	Country:	Date of Birth:	Valid to: Date Issued:
Place of residence, street:			

**Additional key** (recommended if key: Additional/misplaced; if key has been misplaced, lock the affected track)  
 **Spare key** (recommended if key: Lost/stolen/defective)  
 **If a mechanical key has been lost**, the customer is notified of the fact that a new mechanical locking set should be installed for safety reasons.

Notes: \_\_\_\_\_

Quantity	Part Number	Designation

Date _____	Signature of employee _____	Signature of authorized customer/ delegate _____
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Tracks have been disabled/enabled and printout from Star Diagnosis has been added  
 Old TRP was kept by customer       Old TRP was scrapped or returned

**Vehicle key(s) was (were) taken into operation on the vehicle**

<b>TRP handed out:</b>	Date _____	Printed Name _____	Signature of Employee _____
<b>TRP received:</b>	Date _____	Printed Name _____	Signature of Authorized Customer/Delegate _____

\* Identification documents must be submitted as originals and checked, exception authorization – ID of authorized customer. Personal identification documents may not be copied and archived. Exception: If not readable and transferable personal documents by foreign language characters in exceptional cases and filing a copy is permitted. Archiving: Form sheet and authorization must be stored in archives as originals and vehicle documents as a copy. The archiving period is 6 years. Upon request, a copy must be handed over to the customer.


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## STAR TekInfo Form

Star Bulletin S-B-80.57/62b, dated January 26, 2015 – Ordering a Replacement or Additional Key

Page 1



**Order Form – DAS4 Key**  
**Register Vehicle as Present for Programming**

MY2013 to Present, Model 166, 207, 212; MY-All, Models 117, 156, 205, 217, 218, 222, 231, 242

**Special case: "Key No Longer Present"**  
**Details regarding vehicle/order:**

VIN of affected vehicle: _____	
Repair Order Number: _____	
With access to vehicle – diagnostic unit can be connected.	<input type="checkbox"/>
Without access to vehicle diagnostic unit cannot be connected.	<input type="checkbox"/>
Reason for special case: _____ _____ _____ _____ _____	<input type="checkbox"/>
<b>Parts availability</b> unprogrammed key has been checked (see latest version of S-B-80.57/62a or latest version).	<input type="checkbox"/>
<b>TRP form sheet</b> (e.g. legitimation, vehicle data, country-specific vehicle document) is completely filled out in accordance with the TRP specifications. Keys are put into operation at the vehicle.	<input type="checkbox"/>

The TRP form, this application form, a copy of the vehicle document, and repair order is archived for six years by the Mercedes-Benz dealership carrying out the work (retail).

After "Register as present" (enabling by TE/SDP), the key(s) is/are immediately programmed or ordered in accordance with the specifications in SI80.57-P-0008A.	<input type="checkbox"/>
If the keys have been programmed at the vehicle, the vehicle must be registered online via XENTRY Diagnostics (same as for a key order) so that the procedure can be completed at TE/SDP and meets the TRP safety regulations.	<input type="checkbox"/>

4 S-B-80.57/62b

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## STAR TekInfo Form

Star Bulletin S-B-80.57/62b, dated January 26, 2015 – Ordering a Replacement or Additional Key

Page 2

The application is sent to the Diagnosis User Help Desk via XSF (ECU programming → SCN coding → Code change → Parameterize → FBS4 → Immobilizer).

No further documents are required.

The application can only be accepted if all information is present and has been confirmed.

**Location details for Mercedes-Benz dealership carrying out work (retail):**

Date:	_____
Dealer Name:	_____

**Employee/service receptionist/mechanic involved (retail):**

Name:	_____
First Name:	_____
Signature:	_____

**Responsible service manager/workshop foreman (retail):**

Name:	_____
First Name:	_____
Signature:	_____

**Note:** For special processes where the "authorized customer" or the "authorized representative" cannot or cannot clearly be determined and entered in the TRP form sheet (if legitimation cannot be performed directly by the legal vehicle owner or by an authorized person in accordance with the original certificate of authorization, e.g. insurance firm, leasing company, authorities), please always contact the relevant national organization first in order to clarify and confirm the local legal requirement.