



U.S. Department of Transportation

National Highway Traffic Safety Administration

ODI RESUME

Investigation:	AQ 18-004		
Prompted by:			
Date Opened:	10/22/2018		
Investigator:	Jennifer Kruger	Reviewer:	Jennifer Timian
Approver:	Stephen Ridella		
Subject:	Recall Administration Concerns		

MANUFACTURER & PRODUCT INFORMATION

Manufacturer:	Mercedes-Benz USA, LLC.
Products:	Various Makes and Models
Population:	1,419,373 (Estimated)

Problem Description: Recurrent recall administration and execution concerns, including service disruptions impacting the availability of information concerning open recalls on the NHTSA VIN-based look up tool.

ACTION / SUMMARY INFORMATION

Action: Open AQ

Summary:

The Recall Management Division (RMD) has identified recurrent recall reporting and execution lapses in Mercedes-Benz (MBUSA) safety recalls. The issues include untimely owner notification letters and quarterly reporting, recall information reporting concerns, and VIN Lookup Tool service disruptions and issues. RMD is opening this audit query to investigate these issues.

RMD's review of MBUSA recalls contains information showing that MBUSA may have exceeded regulatory requirements for mailing owner notification letters, in addition to timely production of copies of the owner letters it did issue. There are also concerns about recurring and unannounced failures of the MBUSA datasystem in supplying responsive information to NHTSA's VIN look up tool, with the end result of potentially impacted vehicle owners not being able to obtain safety critical information about open safety recalls on their vehicles. RMD also has questions concerning the company's process and cadence for making recall decisions and notifying NHTSA about them.

RMD's review further revealed possible omissions from recalls reports on fundamental and required items, such as planned owner notification dates, planned dealer notification dates, and estimated percentage of units with a defect/noncompliance. Even when notified of the omissions, the company was at times slow to provide the missing information. In addition, records reflect an inconsistent compliance with required timetables for providing recall completion reports (e.g., quarterly reports).

RMD is opening this Audit Query (AQ) investigation to investigate MBUSA's compliance with reporting and other recalls-related requirement and to better understand MBUSA's management of safety recalls and where processes could be improved to better support compliance with minimum reporting and recalls execution requirements.