



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

ODI RESUME

Investigation: DP 20-004
Prompted by: Defect Petition
Date Opened: 04/24/2020
Investigator: Frederick Lamance
Approver: Stephen Ridella
Subject: Rear brake line failure

Date Closed: 10/09/2020
Reviewer: Jeff Quandt

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Mercedes-Benz USA, LLC.
Products: 2010-2015 Mercedes-Benz E-Class Sedan and Wagon
Population: 245,000

Problem Description: The rear brake lines allegedly experience premature corrosion failure, potentially resulting in the loss of the rear brake hydraulic circuit.

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	1	0	0
Crashes/Fires:	0	0	0
Injury Incidents:	0	0	0
Fatality Incidents:	0	0	0
Other*:	1	0	0

*Description of Other: Rear brake line corrosion with no leakage.

ACTION / SUMMARY INFORMATION

Action: This defect petition has been denied.

Summary:

On April 10, 2020, NHTSA's Office of Defects Investigation (ODI) received a defect petition from Mr. Surjit Singh alleging premature corrosion of the rear brake lines in his 2013 Mercedes-Benz E350 sedan. The petitioner states that he was recently informed by a Mercedes dealer service department that his car had "severely rusted brake lines that need[ed] to be replaced immediately at a cost of about \$3300." He further stated that the dealer service advisor informed him that he had seen the issue on many cars like his. The petitioner requested "that NHTSA launch an investigation into this serious issue of rusting brake lines on [his] 2013 Mercedes E350." The brake line corrosion reported by the petitioner did not result in brake line leakage or any compromise in brake system performance before it was detected in a dealer vehicle inspection. The petitioner submitted a complaint to NHTSA documenting his experience (NHTSA ID 11319024).

On April 24, 2020, ODI opened Defect Petition DP20-004 to evaluate the petitioner's request. ODI conducted a search for all consumer complaints and Early Warning Reporting (EWR) data related to allegations of brake line corrosion or leakage in 2013 Mercedes-Benz E350 sedans and similarly equipped vehicles. The 2013 E350 is a fourth-generation Mercedes-Benz E-Class vehicle (W212 platform), which was first sold in the United States in 2009 as a 2010 model. Mercedes-Benz sold approximately 245 thousand model year 2010 through 2015 E-Class sedan and wagon vehicles in the United States with the same brake line design as the petitioner's vehicle.

ODI's search for complaints and EWR data in 2013 Mercedes E350 vehicles found no additional records related to the alleged defect. Expanding the search to all W212 platform vehicles identified just one incident, a complaint alleging unspecified brake line corrosion and leakage in a 2011 Mercedes-Benz E550 (NHTSA ID 10902081). The complaint did not allege that the brake line leakage resulted in reduced brake performance, crash, or injury. The resulting failure rate of 0.4 failures per hundred thousand vehicles is extremely low for a population that includes vehicles that have

been in service for over ten years. After reviewing the available data, ODI has not identified evidence of a defect trend in the subject E-Class vehicles that would support opening a defect investigation into premature brake line corrosion failure.

NHTSA is authorized to issue an order requiring notification and remedy of a defect if the Agency's investigation shows a defect in design, construction, or performance of a motor vehicle that presents an unreasonable risk to safety. 49 U.S.C. §§ 30102(a)(9), 30118. Since the information before the Agency is not indicative of a vehicle-based defect, it is unlikely that any investigation opened because of granting this petition would result in an order concerning the notification and remedy of a safety-related defect. Therefore, upon full consideration of the information presented in the petition and the potential risks to safety, the petition is denied. The denial of this petition does not foreclose the Agency from taking further action if warranted or the potential for a future finding that a safety-related defect exists based upon additional information the agency may receive.

A Federal Register notice further detailing NHTSA's reasons for denial of the petition will be forthcoming.