



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

ODI RESUME

Investigation: PE 21-001
Date Opened: 01/08/2021
Investigator: Steven Posada
Approver: Stephen Ridella
Subject: Front Roof Panel Detachment

Date Closed: 10/14/2021
Reviewer: Gregory Magno

MANUFACTURER & PRODUCT INFORMATION

Manufacturer: Mercedes-Benz USA, LLC
Products: Mercedes-Benz Multiple Models 2014-2020
Population: 15,099
Problem Description: Stationary front roof panel detachment from the vehicle while driving at highway speeds

FAILURE REPORT SUMMARY

	ODI	Manufacturer	Total
Complaints:	10	47	57
Crashes/Fires:	0	0	0
Injury Incidents:	0	0	0
Fatality Incidents:	0	0	0

ACTION / SUMMARY INFORMATION

Action: This Preliminary Evaluation is Closed. Recall 21V197

Summary:

On January 8, 2021, after ongoing review with Mercedes Benz, the National Highway Traffic Safety Administration (NHTSA) Office of Defects Investigation (ODI) opened PE21-001 to assess allegations of front roof panel detachments while driving at highway speeds in certain 2015 Mercedes-Benz (Mercedes) C-Class vehicles.

The subject front roof panel is a stationary panel composed of polycarbonate and is attached to the vehicle via adhesive at the time of manufacture. The panel is found on subject vehicles equipped with panoramic sunroofs. Over time, the subject panels may exhibit cosmetic degradation leading to replacement of the panel, a procedure which entails: removal of the old panel and adhesive, site preparation, and installation of a replacement panel with new adhesive.

The consumer complaints that prompted the opening of PE21-001 all described detachments of front roof panels that had been replaced after the vehicle was put into service.

Mercedes' internal investigation identified a broader scope of affected vehicles (2014-2020 CLA, GLA, C, S, GLC, and GLE class) and found the following potential service procedure- related causes of front roof panel detachments:

- Improper surface pretreatments such as the use of the wrong primer or cleaner or scoring of the surface; or
- Use of the incorrect adhesive.

These conditions lead to a front roof panel bond that, even if sound at the time of repair, cannot maintain its strength over time and environmental exposure.

Mercedes updated its service and parts ordering systems to reinforce the proper use of specified kits and procedures via webinars, shop foreman meetings, and explicit reference to the risks incurred by diverging from the repair procedures. Mercedes is also furnishing parts ordering assistance, and will hold dealerships accountable for improper repairs.

ODI's analysis of the ten complaints it has received from the public (VOQ's) and MBUSA's complaint data submitted in response to the information request letter for PE21-001 identified a total of 57 non-duplicative reports alleging incidents in which the front roof panel detached from the vehicle while in motion. Included within the 57 reports are incidents where consumers state the panel detached "...and flew off into traffic."

On March 19, 2021, Mercedes notified NHTSA that it would recall subject vehicles with front roof panels known to have been replaced after the original sale of the vehicle. In total, the recall (designated as Recall 21V197) covers 15,099 vehicles that were ever registered in the United States.

Based on Recall 21V197 and the remedy implemented by Mercedes, further investigation does not appear to be warranted at this time. Accordingly, this investigation is closed.

The ODI complaints cited above can be viewed at www.nhtsa.gov under the following ODI identification numbers: 11376425, 11352686, 11351629, 11349158, 11341541, 11337594, 11324100, 11311591, 11222127, 11404183