

Part 573 Safety Recall Report

15V-087

Manufacturer Name : Mercedes-Benz USA, LLC.**Submission Date :** APR 21, 2016**NHTSA Recall No. :** 15V-087**Manufacturer Recall No. :** 2015020003**Manufacturer Information :**

Manufacturer Name : Mercedes-Benz USA, LLC.

Address : One Mercedes Dr, PO Box 350
Montvale NJ 07645-0350

Company phone : 1-800-367-6372

Population :

Number of potentially involved : 9,137

Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2015-2015 Mercedes-Benz C300

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : 205.049 8,430 affected vehicles.

Production Dates : JUN 18, 2014 - SEP 05, 2014

VIN Range 1 : Begin : NR End : NR Not sequential

Vehicle 2 : 2015-2015 Mercedes-Benz C400

Vehicle Type : LIGHT VEHICLES

Body Style : 4-DOOR

Power Train : GAS

Descriptive Information : 205.066 707 affected vehicles

Production Dates : JUN 18, 2014 - SEP 05, 2014

VIN Range 1 : Begin : NR End : NR Not sequential**Description of Noncompliance :**

Description of the Noncompliance : Pursuant to the requirements of 49 C.F.R. Part 573, and on behalf of our parent company, Daimler AG (DAG), Mercedes Benz USA, LLC (MBUSA) is filing this report with respect to a noncompliance with a motor vehicle safety standard which has been determined to exist in the vehicles identified above. Headlamps on the subject vehicles might not meet the requirements of §571.108 S10.18.4, which requires that headlamps with low beams must not have a horizontal adjustment mechanism.

Subject vehicles are designed to meet this requirement by sealing off the headlamp horizontal adjustment screw with a non-removable sealing cap after initial adjustment in the manufacturing plant.

Due to incorrect assembly instructions, the sealing cap might not have been installed on subject vehicles in the manufacturing plant.

FMVSS 1 : 108 - Lamps, reflective devices, and assoc. Equipment

FMVSS 2 : NR

Description of the Safety Risk : If the original horizontal low beam aim is altered, a misaimed headlamp could cause increased glare to oncoming drivers, and may increase the risk of a crash

Description of the Cause : Due to incorrect assembly instructions, the sealing cap might not have been installed on subject vehicles in the manufacturing plant.

Identification of Any Warning that can Occur : None

Supplier Identification :

Component Manufacturer

Name : NR

Address : NR

NR

Country : NR

Chronology :

The potential issue was discovered in September 2014 during regular production checks for C-class vehicles at the manufacturing plant in Tuscaloosa, AL.

After recognizing that the sealing caps were missing, initial analysis in the manufacturing plant determined that this was due to errors in the assembly instructions. Subsequently, a plant action was launched to rework all vehicles not yet shipped and correct the documentation of the assembly instructions.

Following the information about potentially missing sealing caps, DAG analyzed potential technical implications, specifically with respect to the requirements of FMVSS 108. Furthermore, tests were launched to check the illumination levels with different horizontal adjustment positions of the low beams. The results of these tests were analyzed and compared to the illumination levels as required by FMVSS 108.

Additional investigations determined the population of potentially affected vehicles that had not been reworked under the plant action.

In early February 2015, DAG determined that a potential non-compliance of subject vehicles with the requirements of FMVSS108 S10.18.4 cannot be excluded. In April, 2016, NHTSA ruled that the Petition was denied.

Description of Remedy :

Description of Remedy Program : MBUSA intends to file a petition for exemption from the notification and

Description of Remedy Program : remedy requirements of the Act pursuant to 49 C.F.R. Part 556, on the basis that this noncompliance is inconsequential to motor vehicle safety. With denial of the petition, an authorized Mercedes-Benz dealer will retrofit the sealing caps on the headlamps of the affected vehicles. Pursuant to 49 C.F.R. § 577.11(e), MBUSA does not plan to provide notice about pre-notice reimbursement to owners since all involved vehicles remain covered under the new vehicle warranty

How Remedy Component Differs from Recalled Component : The sealing cap is installed on subject vehicles in the manufacturing plant.

Identify How/When Recall Condition was Corrected in Production : The sealing cap is installed on subject vehicles in the manufacturing plant beginning September 5, 2014.

Recall Schedule :

Description of Recall Schedule : MBUSA intends to file a petition for exemption from the notification and remedy requirements of the Act pursuant to 49 C.F.R. Part 556, on the basis that this noncompliance is inconsequential to motor vehicle safety. Vehicles in Dealer Inventory will be repair prior to sale or lease. Dealers will be notified of the pending voluntary recall campaign in May 2016. Owners will be notified approximately one week after recall launch to the dealers. A copy of all communications will be provided when available.

Planned Dealer Notification Date : NR - NR

Planned Owner Notification Date : NR - NR

* NR - Not Reported