OMB Control No.: 2127-0004

Part 573 Safety Recall Report

19V-130

Manufacturer Name: Mercedes-Benz USA, LLC.

NHTSA Recall No.: 19V-130

Manufacturer Recall No.: 2019040007



Manufacturer Information:

Manufacturer Name: Mercedes-Benz USA, LLC.

Address: 13470 International Parkway

Jacksonville FL 32218

Company phone: 1-877-496-3691

Population:

Number of potentially involved: 22,637 Estimated percentage with defect: 3 %

Vehicle Information:

Vehicle 1: 2017-2018 Mercedes-Benz C300 Cabriolet

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: WK4J 205.448 3,169 vehicles.

The recall population was determined through production records. Seats not affected by the recall were built with front seatback locks from a different supplier production

batch.

Production Dates: AUG 14, 2015 - JUN 23, 2017

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

Vehicle 2: 2017-2018 Mercedes-Benz C300 4MATIC Cabriolet

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: WK4K 205.449 2666 vehicles.

The recall population was determined through production records. Seats not affected by the recall were built with front seatback locks from a different supplier production

batch.

Production Dates: AUG 14, 2015 - JUN 23, 2017

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

Vehicle 3: 2017-2018 Mercedes-Benz C300 Coupe

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information :	WJ4J 205.348 6	387 vehicles.					
					n records. Seats not affected lifferent supplier production		
Production Dates :	AUG 14, 2015 - 3	IUN 23, 2017					
VIN Range 1:	Begin:	NR	End:	NR	■ Not sequential		
	<u> </u>				1		
Vehicle 4:	2017-2018 Mer	cedes-Benz AM	G C63 S	Coupe			
	LIGHT VEHICLE			•			
Body Style :							
Power Train :							
		110 vobiolog					
Descriptive Information :	WJOH 200.307	ato venicies.					
	The recall population was determined through production records. Seats not affected by the recall were built with front seatback locks from a different supplier production batch.						
Production Dates :							
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
	GAS 1K6F 238.465 4 The recall popul by the recall we batch. AUG 14, 2015 - 3	e vehicles. lation was dete are built with fr	rmined	through productior back locks from a d	n records. Seats not affected lifferent supplier production Not sequential		
	2018-2018 Mer)0 4MA	I'IC Cabriolet			
V -	LIGHT VEHICLE	ES					
Body Style :							
Power Train :	GAS						
Descriptive Information :	1K6G 238.466 1	1 vehicles.					
Production Dates :	The recall population was determined through production records. Seats not affected by the recall were built with front seatback locks from a different supplier production batch. s: AUG 14, 2015 - JUN 23, 2017						
			End.	MD	Mot comential		
VIN Range 1:	Degin:	NR	End:	IN K	☐ Not sequential		

Vehicle 7:	2018-2018 Merc	cedes-Benz E40	0 Coupe)	
Vehicle Type :	LIGHT VEHICLE	S			
Body Style :	2-DOOR				
Power Train:	GAS				
Descriptive Information :	1J6F 238.365 41	2 vehicles.			
					ds. Seats not affected t supplier production
Production Dates :	AUG 14, 2015 -J	UN 23, 2017			
VIN Range 1:	Begin:	NR	End:	NR	■ Not sequential
Vehicle 8	2018-2018 Merc	redes-Benz F40	00 4MAT	TC Coupe	
	LIGHT VEHICLE			ie eeupe	
Body Style :					
Power Train :					
Descriptive Information :		31 vehicles.			
2 00011pu1 0 111101111111111111	100 2 2001000 00	71 (01110100)			
					ds. Seats not affected t supplier production
Production Dates :	AUG 14, 2015 - J	UN 23, 2017			
VIN Range 1:		NR	End:	NR	■ Not sequential
W.1.1.0	0017 0010 15	1 D COO	0.43.64.5	TO C	
	2017-2018 Merc		00 4MA1	IC Coupe	
V -	LIGHT VEHICLE	S			
Body Style : Power Train :					
		40% 1.1			
Descriptive Information :	WJ4K 205.349 5	497 vehicles.			
					ds. Seats not affected t supplier production
Production Dates :	AUG 14, 2015 - J	UN 23, 2017			
VIN Range 1:		NR	End:	NR	Not sequential
Vehicle 10:	2017-2018 Merc	cedes-Benz AM	G C43 Ca	abriolet	
Vehicle Type :	LIGHT VEHICLE	S			
Body Style :	2-DOOR				
Power Train :	GAS				
Descriptive Information :	WK6E 205.464	1167 vehicles.			
				O -	ds. Seats not affected t supplier production

	batch.					
Production Dates :	AUG 14, 2015 - J	UN 23, 2017				
VIN Range 1:		NR	End:	NR	■ Not sequential	
					_	
Vehicle 11:	2017-2018 Merc	cedes-Benz AMO	G C43 C	oupe		
Vehicle Type :	LIGHT VEHICLES	S				
Body Style :						
Power Train :	GAS					
Descriptive Information :	WK6E 205.464 1	443 vehicles.				
	The recall population was determined through production records. Seats not affected by the recall were built with front seatback locks from a different supplier production batch.					
Production Dates :	AUG 14, 2015 - J	UN 23, 2017				
VIN Range 1:		NR	End:	NR	■ Not sequential	
					_	
	2017-2018 Merc		G C63 C	abriolet		
V -	LIGHT VEHICLES	S				
Body Style :						
Power Train :	GAS					
Descriptive Information :	WK8G 205.486 3	382 vehicles.				
Decide attent Dates	by the recall wer batch.	e built with fro		through production record back locks from a different		
Production Dates :	AUG 14, 2015 - J	UN 23, 2017				
WIND 1.	Darwin .		End.	ND	□ Not commist	
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential	
		NR			☐ Not sequential	
Vehicle 13:	2017-2018 Merc	NR cedes-Benz AMO			☐ Not sequential	
Vehicle 13 : Vehicle Type :	2017-2018 Merc	NR cedes-Benz AMO			☐ Not sequential	
Vehicle 13:	2017-2018 Merc LIGHT VEHICLES 2-DOOR	NR cedes-Benz AMO			☐ Not sequential	
Vehicle 13 : Vehicle Type : Body Style : Power Train :	2017-2018 Merc LIGHT VEHICLES 2-DOOR GAS	NR cedes-Benz AMO			☐ Not sequential	
Vehicle 13 : Vehicle Type : Body Style :	2017-2018 Merc LIGHT VEHICLES 2-DOOR GAS WK8H 205.487 2 The recall popula	NR cedes-Benz AMO S 256 vehicles. ation was deter	G C63 S		ls. Seats not affected	
Vehicle 13: Vehicle Type: Body Style: Power Train: Descriptive Information:	2017-2018 Merc LIGHT VEHICLES 2-DOOR GAS WK8H 205.487 2 The recall popular by the recall wer batch.	NR cedes-Benz AMO 256 vehicles. ation was deter	G C63 S	Cabriolet through production record	ls. Seats not affected	
Vehicle 13 : Vehicle Type : Body Style : Power Train :	2017-2018 Merce LIGHT VEHICLES 2-DOOR GAS WK8H 205.487 2 The recall popular by the recall were batch.	NR cedes-Benz AMO 256 vehicles. ation was deter	G C63 S	Cabriolet through production record	ls. Seats not affected	
Vehicle 13: Vehicle Type: Body Style: Power Train: Descriptive Information: Production Dates: VIN Range 1:	2017-2018 Merce LIGHT VEHICLES 2-DOOR GAS WK8H 205.487 2 The recall popular by the recall were batch. AUG 14, 2015 - June Begin:	NR Sedes-Benz AMO S 256 vehicles. ation was deter be built with fro UN 23, 2017 NR	G C63 S mined ont seat	Cabriolet through production record back locks from a different	ls. Seats not affected t supplier production	
Vehicle 13: Vehicle Type: Body Style: Power Train: Descriptive Information: Production Dates: VIN Range 1:	2017-2018 Merce LIGHT VEHICLES 2-DOOR GAS WK8H 205.487 2 The recall popular by the recall were batch. AUG 14, 2015 - June Begin:	NR cedes-Benz AMO 256 vehicles. ation was deter re built with fro UN 23, 2017 NR cedes-Benz AMO	G C63 S mined ont seat	Cabriolet through production record back locks from a different	ls. Seats not affected t supplier production	
Vehicle 13: Vehicle Type: Body Style: Power Train: Descriptive Information: Production Dates: VIN Range 1: Vehicle 14: Vehicle Type:	2017-2018 Merce LIGHT VEHICLES 2-DOOR GAS WK8H 205.487 2 The recall popular by the recall were batch. AUG 14, 2015 - June Begin: 2017-2018 Merce LIGHT VEHICLES	NR cedes-Benz AMO 256 vehicles. ation was deter re built with fro UN 23, 2017 NR cedes-Benz AMO	G C63 S mined ont seat	Cabriolet through production record back locks from a different	ls. Seats not affected t supplier production	
Vehicle 13: Vehicle Type: Body Style: Power Train: Descriptive Information: Production Dates: VIN Range 1:	2017-2018 Merce LIGHT VEHICLES 2-DOOR GAS WK8H 205.487 2 The recall popular by the recall were batch. AUG 14, 2015 - JUBegin: 2017-2018 Merce LIGHT VEHICLES 2-DOOR	NR cedes-Benz AMO 256 vehicles. ation was deter re built with fro UN 23, 2017 NR cedes-Benz AMO	G C63 S mined ont seat	Cabriolet through production record back locks from a different	ls. Seats not affected t supplier production	

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Descriptive Information: WJ8G 205.386 172 vehicles.

The recall population was determined through production records. Seats not affected by the recall were built with front seatback locks from a different supplier production

batch.

Production Dates: AUG 14, 2015 - JUN 23, 2017

Description of Defect:

Description of the Defect: Daimler AG ("DAG"), the manufacturer of Mercedes-Benz vehicles, has

determined that on certain C-Class Coupe/Cabriolet (A/C 205 platform) and E-Class Coupe/Cabriolet (A/C 238 platform) vehicles, the seatback of the front seats might not be fully locked on the right side of the respective seat.

FMVSS 1: NR FMVSS 2: NR

Description of the Safety Risk: If the seatback is improperly locked, unsecured objects on the back seats

might become airborne inside the cabin in the event of a crash. In this case,

the risk of injury to front seat occupants might be increased.

Description of the Cause: Due to a production deviation at a supplier, a certain batch of seatback locks

might not lock properly.

Identification of Any Warning The customer will not receive an advance warning due to the nature of the

that can Occur: failure mechanism.

Supplier Identification:

Component Manufacturer

Name: Lear Corporation GmbH

Address: La Rochelle Str. 1

Bremen FOREIGN STATES 28309

Country: Germany

Chronology:

As already reported in March 2018: In May 2017, DAG received first reports about components of the seatback being out of tolerance from the seat supplier. Investigations were launched at the responsible sub-supplier to determine the root-cause of the deviations. In late May 2017, a defective batch of levers from the sub-supplier was identified to be the root-cause for the improper locking of seatbacks. In late June 2017, upon completion of initial investigations, a clean point was established at the supplier. In parallel, a plant action was launched at the DAG assembly plant in order to rework the seatbacks of potentially affected vehicles. In August 2017, investigations were launched to analyze potential consequences of improperly locked seatbacks. In December

2017, it was concluded that an improper locking of the seatback on the left side of the seat would already be detected by a micro switch in the locking mechanism of the seatback. This would be displayed in the instrument cluster, would therefore be remedied at the assembly plant and in consequence be excluded from the scope of this issue. Until March 2018, potential consequences of improperly locked right side of the seatbacks had been analyzed by various tests as well as crash simulations. On March 22, 2018, DAG determined that a potential safety risk cannot be ruled out.

Update February 2019: In January 2019, the seat supplier informed DAG that parts which had been manufactured before April 2017 could potentially also be affected by this topic. This ultimately resulted in an extension of the range of potentially affected vehicles reported as part of NHTSA recall 18V207, back to the supplier's start of production. The original clean point remains unchanged. Thus, DAG updated the scope of potentially affected vehicles based on the information provided by the supplier. In February 2019, DAG determined that the previously communicated potential safety risk had to be extended on an additional 22,652 vehicles.

Description of Remedy:

Description of Remedy Program : As a precautionary measure an authorized Mercedes-Benz dealer will

check the locking of the seatback on the affected vehicles and replace the

seatback, if necessary.

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 Front seatback lock out of different supplier production batch.

 $from\ Recalled\ Component:$

Identify How/When Recall Condition Adaptation of production procedures at the supplier ensures that this

was Corrected in Production: issue can no longer occur from August 11, 2017 onwards.

Recall Schedule:

Description of Recall Schedule: Dealers will be notified of the pending voluntary recall campaign in

March 2019. A copy of all communications will be provided when

available.

Owners will be notified via an interim letter in April 2019, and again once

the remedy is available in June 2019.

Planned Dealer Notification Date: MAR 26, 2019 - NR

Planned Owner Notification Date: APR 12, 2019 - NR

* NR - Not Reported