

## Chronology of Defect/Noncompliance Determination

In July 2018, DAG became aware of this issue by a notification from the VAN assembly plant in Düsseldorf. Investigations were initiated to determine the scope of this topic. The investigation revealed that the DAG vans as well as the passenger cars divisions had both been supplied with potentially defective door locks.

A plant campaign was launched at the respective assembly plants to contain potentially affected vehicles. At this time, the passenger cars assembly plant reported that all affected vehicles had been reworked within the plant. However, some potentially affected van vehicles had already been released to the markets. Investigations for the van vehicles were initiated.

In the context of these investigations, DAG vans division and the supplier were able to identify potential issues arising from an operating lever subcomponent that affected the right side of the vehicles. It was found that when the doors were locked electronically, there were instances in which the right side doors could not be opened from inside and outside the vehicles. This was found to be due to the supplier having utilized operating levers with the wrong geometry for the vehicles in which the door lock assembly was being installed. As a result, the clutch lever did not fall behind the designated driving hook on the operating lever after locking and unlocking.

In October 2018, DAG vans division submitted a Defect Information Report “DIR” for vans vehicles. At the time of the DIR, DAG’s assessment remained that all of the passenger cars potentially equipped with defective door locks had been reworked within the plant.

In November 2018, the assembly plant for passenger cars reported that despite previous statements, some vehicles might have been released into the market without rework.

Because the safety consequence as applied to the vans depended in part on the geometry of the subcomponent and the way in which the assembly was integrated into the vehicle, DAG worked in early 2019 with the supplier to determine if an incorrect geometry of the operating lever might have a similar consequence in passenger cars.

In late February, 2019, in response to NHTSA’s inquiry to identify the supplier, the DAG vans division additionally informed the agency that the passenger car division was investigating door lock assemblies that were purchased from the same supplier.

In addition, all other relevant production plants and vehicle preparation centers checked the rework status of the produced vehicles to determine the range of affected vehicles.

In March 2019, DAG decided it could not rule out a potential safety risk and made the decision to conduct a safety recall to replace the door lock with the correct component.

With regard to vans, DAG had received 13 field reports; but had received no field reports with regard to passenger cars.