

Chronology of Defect/Noncompliance Determination

At the end of September 2018, DAG was informed by its airbag supplier that the airbag material seam separated in a single case during the deployment of a front passenger airbag in conformity of production ("COP") testing of the instrument cluster with the airbag, carried out by the instrument cluster supplier. In November 2018, DAG was informed by the instrument cluster supplier of a second, similar occurrence during COP testing. Analysis of the front passenger airbag after deployment showed a small tear at the circumferential seam of the airbag material and an investigation was initiated. The investigation initially indicated a production error as a potential root cause for the tearing of the airbag material at the seam.

In December 2018, working together with the supplier, DAG initiated further analyses. These analyses included numerical simulations and physical testing on potentially affected airbags in order to determine whether the small seam tears that were previously observed might adversely affect impact occupant protection in a crash.

The supplier completed its testing and reported back to Daimler in March 2019. The supplier concluded that, while the front passenger airbag material might slightly tear at the circumferential seam during an airbag deployment, the supplier's analysis did not indicate that the airbag's restraint function would be impaired, and therefore the occupant protection would not be adversely impacted.

DAG initiated internal analyses in the spring of 2019 to further verify the supplier's conclusion.

DAG found that although all data available showed only a slight tear of the airbag cushion along the seam, the characteristics and size of the tear in an actual crash might vary, and the potential for impaired airbag function could not be ruled out. DAG identified the range of potentially affected vehicles via production records, and on July 26, 2019, DAG determined that a potential safety risk cannot be ruled out and a recall was initiated.