Mercedes-Benz Part 573 Submission
Original Submitted to Portal December 13, 2019
Chronology-Only section
Supplement to Original Submission

<u>Chronology of Defect/Noncompliance Determination</u>

In September 2019, MBAG's product regulation team became aware of a supplier's report from November 2017, which was believed to be related to a recall already decided in August 2018 (18V-514). The report states that a software change had been made earlier in November 2017. This software change related to the calibration of the occupant classification system on seats provided by that supplier. The supplier reported that within its facilities, a seat is placed into a Force Application Machine (FAM), which determines the correct calibration for the seat based on the seat variant and various physical dimensions. There was a possibility that if a seat had been rejected or if the calibration was incomplete, the FAM would nonetheless retain the information relevant to that seat and apply it to the following seat, which could be of a different seat variant, therefore causing a wrong calibration. In the thorough analysis of the report, it became apparent that it had a different root cause than the recall conducted in 2018. After confirming that the 2018 recall did not involve the same vehicle population, MBAG promptly investigated the potential impact of the FAM calibration concerns. This included the extent to which the passenger airbag status displays were accurately capturing the occupancy status of the potentially affected seats and the extent to which seats may have received an accurate calibration even if the calibration was set for the previous seat in the FAM. MBAG has received no reports of any field incidents – including customer complaints, warranty claims or field reports – either in the US or abroad, suggesting that the airbag status display was not accurately reflecting the occupancy status of passenger seats.

On December 6, 2019, MBAG determined that a safety relevance could not be ruled out and decided to conduct a global recall with regard to vehicles potentially impacted by the FAM calibration concerns, which includes 129 vehicles in the US market.