OMB Control No.: 2127-0004

Part 573 Safety Recall Report

21V-483

Manufacturer Name: Mercedes-Benz USA, LLC

Submission Date: JUL 01, 2021 NHTSA Recall No.: 21V-483 Manufacturer Recall No.: NR



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: 4,925 Estimated percentage with defect: 1 %

Vehicle Information:

Vehicle 1: 2021-2021 Mercedes-Benz G550

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive Information: Mercedes-Benz 2021 G-Class 236 vehicles

The recall population was determined through production records.

Vehicles outside of the recall population have rear seat row seat belts that meet

current production specifications.

Production Dates: NOV 21, 2020 - JUN 22, 2021

Vehicle 2: 2021-2021 Mercedes-Benz AMG G63

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive Information: Mercedes-Benz 2021 AMG G63 408 vehicles

The recall population was determined through production records.

Vehicles outside of the recall population have rear seat row seat belts that meet

current production specifications.

Production Dates: NOV 21, 2020 - JUN 22, 2021

Vehicle 3:	2021-2021 Mercedes-Benz CLS450						
0.2	LIGHT VEHICLES						
Body Style :							
Power Train :	GAS						
Descriptive Information :	Mercedes-Benz 2021 CLS450 365 vehicles The recall population was determined through production records. Vehicles outside of the recall population have rear seat row seat belts that meet current production specifications.						
Production Dates :	NOV 21, 2020	IUN 22, 2021					
VIN Range 1:		NR	End: NR	☐ Not sequential			
Vehicle 4:	2021-2021 Mer	cedes-Benz E3	50				
Vehicle Type :	LIGHT VEHICLES						
Body Style :							
Power Train :							
Descriptive Information :	Mercedes-Benz 2021 E350 2463 vehicles The recall population was determined through production records. Vehicles outside of the recall population have rear seat row seat belts that meet current production specifications.						
Production Dates :	NOV 21, 2020 -	IUN 22, 2021					
VIN Range 1:	Begin:	NR	End: NR	☐ Not sequential			
Vehicle 5:	2021-2021 Mer	cedes-Benz E4	50				
Vehicle Type :	LIGHT VEHICLE	ES					
Body Style :	4-DOOR						
Power Train :	GAS						
Descriptive Information :	Mercedes-Benz 2021 E450 575 vehicles The recall population was determined through production records. Vehicles outside of the recall population have rear seat row seat belts that meet current production specifications.						
Production Dates :	Production Dates: NOV 21, 2020 - JUN 22, 2021						
VIN Range 1:	,	NR	End: NR	☐ Not sequential			

Vehicle Type : Body Style : Power Train :	: GAS : Mercedes-Benz 2021 AMG CLS53 55 vehicles The recall population was determined through production records.						
	Vehicles outside of the recall population have rear seat row seat belts that meet current production specifications.						
Production Dates :							
VIN Range 1:	Begin:	NR	End:	NR	■ Not sequential		
Vehicle Type : Body Style : Power Train :							
Production Dates :	NOV 21, 2020 -	JUN 22, 2021					
VIN Range 1:	Begin:	NR	End:	NR	■ Not sequential		
	GAS Mercedes-Benz The recall popu	ES 2021 AMG E63 lation was dete e of the recall p	258 vel rmined opulatio	hicles through production reco on have rear seat row sea			
Production Dates :	NOV 21. 2020 -	JUN 22, 2021					
VIN Range 1:		NR	End:	NR	☐ Not sequential		

			G GT43			
Descriptive Information :	Mercedes-Benz 2021 AMG GT43 135 vehiclesThe recall population was determined through production records. Vehicles outside of the recall population have rear seat row seat belts that meet current production specifications.					
Production Dates :	NOV 21, 2020 - J	UN 22, 2021				
VIN Range 1:	Begin:	NR	End:	NR	■ Not sequential	
Vehicle Type : Body Style : Power Train : Descriptive Information :						
Production Dates : VIN Range 1 :		UN 22, 2021 NR	End:	NR	☐ Not sequential	
	2021-2021 Merc LIGHT VEHICLE		G GT63			
Power Train : Descriptive Information :	GAS Mercedes-Benz 2 The recall popul	ation was deter of the recall po	mined pulatio	hicles through production record n have rear seat row seat b		
Power Train :	GAS Mercedes-Benz 2 The recall popul Vehicles outside current product	ation was deter of the recall po on specification	mined pulatio	through production record		
Power Train : Descriptive Information :	GAS Mercedes-Benz 2 The recall popul Vehicles outside current product NOV 21, 2020 - J	ation was deter of the recall po on specification	mined pulatio	through production record n have rear seat row seat b		

Description of Noncompliance:

Description of the Mercedes-Benz AG ("MBAG"), the manufacturer of Mercedes-Benz vehicles, has Noncompliance: been informed that it might have been supplied by its supplier Autoliv with certain seat belt assemblies manufactured by certain Autoliv Group companies between October 26, 2020 and January 27, 2021, which might not fulfill certain requirements of FMVSS 208.

The potential issue is described by Autoliv in its equipment report as follows: "Autoliv has determined that these seat belt assemblies do not comply with FMVSS 208 S7.1.1.5, which requires each designated seating position except the driver's position to have "a seat belt assembly whose lap belt portion is lockable so that the seat belt assembly can be used to tightly secure a child restraint system." The subject seat belt assemblies have a feature that converts the retractor from an emergency locking retractor (ELR) to an automatic locking retractor (ALR). The seat belts convert to the ALR mode after the webbing has been fully withdrawn from the retractor. The system is designed so that as the seat belt is released into the retractor, the ALR function remains active so a child restraint seat can be tightly secured. However, in certain seat belt assemblies the ALR function deactivates early before the webbing is fully retracted."

FMVSS 1: 208 - Occupant crash protection

FMVSS 2: NR

Description of the Safety Risk: The potential impacts are described by Autoliv in its equipment report as follows:

> "This noncompliance does not impact the compliance or functionality of the seat belt assemblies with respect to their normal use by adult passengers or use of the LATCH system to secure child restraint seats. With child restraint seats for which the vehicle owner elects to use the seat belt to secure the child restraint seat instead of the LATCH system, even in a braking situation the normal seat belt locking mechanism, or ELR, prevents the seat belt from lengthening and the child restraint seat from moving even if the ALR functions not activated. In addition, in a crash situation, seat belts equipped with pretensioners have the functional equivalent of the ALR function and, as a result, even when the vehicle owner elects to use the seat belt instead of the LATCH system to secure the child restraint seat, there is no increased risk to the safety of child restraint seat occupants."

> After having been informed by Autoliv on June, 18, 2021 regarding the filed equipment report, Mercedes-Benz AG started its own analysis of the issue, vehicles affected and potential consequences which remains ongoing. Based on information provided by the supplier so far, Mercedes Benz AG is currently considering submitting a petition for inconsequential non-compliance. The underlying analysis is ongoing and MBAG's decision to whether it will file the petition remains subject to change.

Description of the Cause:

The cause of the potential issue is described by Autoliv in its equipment report as follows:

"The subcomponent supplier of the ALR levers used in the subject seat belt

assemblies produced dimensionally out of tolerance parts that may cause the ALR to deactivate before the seat belt webbing is fully retracted."

Identification of Any Warning According to Autoliv's equipment report:

that can Occur: "A vehicle owner who elects to use the seat belt instead of the LATCH system to secure a child restraint seat will notice that the audible clicking noise made when the ALR function is activated stops well before the seat belt webbing is

fully retracted."

Involved Components:

Component Name 1: seat belt rear seat

Component Description: seat belt rear seat USA left

Component Part Number: A21386007853D53,A21386007857P84,A21386007859C94,A21386023859C94

Component Name 2: seat belt rear seat

Component Description: seat belt rear seat USA central

Component Part Number: A21386016853D53,A21386016857M89,A21386016857P84,A21386016858U14

Component Name 3: seat belt rear seat

Component Description: seat belt rear seat USA central

Component Part Number: A21386016859C94,A21386034857P84,A21386034858U14,A21386034859C94

Component Name 4: seat belt rear seat

Component Description: seat belt rear seat USA right

Component Part Number: A21386008853D53,A21386008857M89,A21386008857P84,

A21386008857P84,A21386024858U14

Component Name 5: seat belt rear seat

Component Description: seat belt left rear seat USA, seat belt right rear seat USA

Component Part Number: A46386055009C94, A46386056009C94

Component Name 6: seat belt rear seat

Component Description: seat belt rear seat central

Component Part Number: A46386026019C94

Supplier Identification:

Component Manufacturer

Name: Autoliv Inc

Address: Klarabergsviadukten 7

Section B7 Stockholm Foreign States 111 64

Country: Sweden

Chronology:

See Autoliv's equipment report for details regarding the investigation of the issue.

On June 18, 2021, Mercedes-Benz AG was informed by Autoliv regarding the filed equipment report related to the seatbelt assembly's compliance with FMVSS 208, S7.1.1.5. and the potential supply of affected seat belts for Mercedes-Benz vehicles.

On June 25, 2021, MBAG decided to submit its own Noncompliance Information Report based on the determination of the supplier. Based on information provided by the supplier so far, Mercedes Benz AG is currently considering submitting a petition for inconsequential non-compliance. The underlying analysis is ongoing and MBAG's decision to whether it will file the petition remains subject to change.

Description of Remedy:

Description of Remedy Program: Based on information provided by the supplier so far, Mercedes Benz AG is currently considering submitting a petition for inconsequential noncompliance. The underlying analysis is ongoing and MBAG's decision to whether it will file the petition remains subject to change.

> If NHTSA denies the petition for inconsequential noncompliance, an authorized Mercedes-Benz dealer will check the rear seat row seat belts of the potentially affected vehicles and replace them, 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 the involved vehicles would not have been previously subject to the condition described.

How Remedy Component Differs from Recalled Component:

According to Autoliv's equipment report:

"The ALR system in the replacement seat belt assemblies contain ALR levers that were manufactured according to production specification. "

Remedy Part number: A21386007853D53 A21386007857P84 A21386007859C94 A21386023859C94 A21386016853D53 A21386016857M89 A21386016857P84 A21386016858U14 A21386016859C94 A21386034857P84 A21386034858U14 A21386034859C94 A21386008853D53 A21386008857M89 A21386008857P84 A21386024858U14

A46386055009C94 A46386056009C94 A46386026019C94

Identify How/When Recall Condition According to Autoliv's equipment report: was Corrected in Production:

"Changes to the production parameters at the subcomponent supplier ensure that this issue can no longer occur from January 11, 2021, onward."

Recall Schedule:

Description of Recall Schedule: Dealers will be notified of the pending voluntary recall campaign on July 2, 2021. If NHTSA denies the petition for inconsequential noncompliance owners will be notified of the voluntary recall campaign approximately

one week

after launch to the dealers. A copy of all communications will be provided

when available.

Planned Dealer Notification Date : JUL 02, 2021 - NR Planned Owner Notification Date : AUG 24, 2021 - NR

* NR - Not Reported