

Attachment:

Chronology of Defect/Noncompliance Determination:

In March 2018, MB Vans received a preliminary evaluation (PE) information request from NHTSA regarding reports of fuel hose leakage in model year 2016 Metris vans. MB Vans' analysis and evaluation in response to the PE did not identify evidence of a specific risk of fire or vehicle disablement related to the fuel line. Nonetheless, on November 27, 2018, MB Vans initiated a voluntary recall for Model Year 2016 to 2017 Metris (Platform 447) vans. The recall ID 18V-837 applied to Model Year 2016 to 2017 Metris (Platform 447) vans produced prior to March 15, 2017, when the production and equipment changes were made.

All Metris vans are originally produced in MB Vans' Vitoria, Spain production plant. Vehicles intended for sale in the US are imported both as complete vehicles ("CBU") and as component parts (semi-knocked-down or "SKD"). SKD components are reassembled into Metris vans at MB Vans' Charleston, South Carolina production plant.

Following the recall, MB Vans received occasional, isolated, scattered customer complaints regarding fuel odor or fuel leaks involving Metris vans. These complaints were received sporadically between 2017 and 2020, but MB Vans did not identify any repeated or consistent variations from production specifications for the fuel hose connections. Nevertheless, MB Vans is continually focused on improving its production processes.

On May 19, 2020, MB Vans implemented in-line inspection and testing protocols for the fuel hose connections at its Vitoria and Charleston plants. The new measures included a tensile force verification test to ensure the fuel hose clamps were properly secured. MB Vans also conducted refresher training for employees involved in production and assembly of the fuel line, emphasizing correct use of tools required to properly secure the fuel hose clamps.

At the time when MB Vans implemented these quality check measures, a field analysis team identified four potential production process errors during the fuel line assembly in Vitoria or Charleston: (1) fuel hose not fully advanced over the upper or lower fuel line connection; (2) fuel hose clamp not positioned correctly over the fuel hose connection; (3) fuel hose clamp not closed correctly; or (4) wrong fuel hose clamp mounted. MB Vans believed that the in-line inspection and quality check, as well as the employee refresher training, addressed any production process errors.

MB Vans continued to receive sporadic complaints regarding fuel odor or leakage regarding Metris vans through the end of 2020 and in 2021. On October 27, 2021, MB Vans formally documented the in-line inspection and quality check procedures adopted in 2020, including the tensile force test, that are applied to all Metris vans assembled at the Charleston plant. On November 2, 2021, MB Vans documented the same further process measures at the Vitoria plant.

In each instance described above, MB Vans believed that the quality check procedures, employee refresher training, and other process measures implemented at the Vitoria and Charleston plants addressed any isolated quality errors during fuel line assembly. Following documentation of the process changes in the Charleston and Vitoria plants in October and November of 2021, MB Vans has not received any new complaints regarding fuel odor or leaks from the fuel line on Metris vans. Further, MB Vans has never received any reports of crashes, fires, injuries, or deaths in connection with the fuel line on Metris vans. However, because the process quality control measures were not successful prior to formal documentation in the Metris fuel line production process, MB Vans recognizes that step should have occurred sooner.

Accordingly, on March 2, 2022, in an abundance of caution, MB Vans determined that it could not rule out the risk of fuel leaks from the fuel hose connections on Metris vans in series production from March 15, 2017 until documentation of the process changes on October 27, 2021 (SKD vehicles assembled in Charleston) or November 2, 2021 (CBU vehicles imported from Vitoria). As a result, MB Vans will initiate a recall for affected Metris vans.

By March 2022 MB identified 6 cases of field reports and 222 warranty claims for 214 unique VINs in the US market describing instances in which the customers allegedly experienced issues originating from the affected fuel hose clamps. The field reports were received between March 20, 2018 and February 19, 2021 and the warranty reports from April 9, 2018 to February 3, 2022.