Mercedes-Benz Part 573 Submission Original Submitted to Portal April 8, 2022 Chronology-Only section Supplement to Original Submission

Chronology of Defect/Noncompliance Determination

In November 2018, MBAG launched initial investigations based on individual field reports regarding MB Van vehicles where customers allegedly experienced the subject condition outlined above. For this purpose, parts of affected MB Van vehicles were retrieved from the field and sent to the supplier for analysis. In parallel, the supplier started the development of a more robust software version. This new software was also made available in Passenger Cars series production from October 2019 onward. A further software release with additional improvements was released by the supplier and made available for series production beginning June 2020.

For much of 2020, MBAG operations were severely restricted due to the COVID-19 pandemic. As operations began to resume in the second half of 2020, the ongoing internal review and continuous market observation indicated that this issue might also affect Mercedes-Benz passenger cars.

Over the course of the next months, MBAG conducted further evaluations to identify potential effects in MB passenger cars including systematic testing.

While the subject issue could not be systematically reproduced, it was found that in isolated cases, vehicles that had received the original software version showed the subject condition outlined above.

In spring 2021, the ongoing testing indicated that also vehicles that had received the first improved software version during production, might be affected by the subject condition outlined above.

Although the subject issue could still not be systematically reproduced, In late 2021, MBAG could not exclude the possibility that a deviation might be present in the passenger car rearview image software. Subsequently, MBAG determined the potentially affected vehicles in the field. In the beginning of 2022, detailed evaluations were performed to assess the extent to which the deviation might impact the specific regulatory requirements of the affected countries.

On April 1st, 2022, MBAG determined that a potential non-compliance cannot be completely ruled out and decided to conduct a recall.

During MBAGs analysis, 8 cases in the US were identified from December 2018 to August 2021. MBAG has not received any reports of crashes, injuries, or property damage associated with this issue.

In late June 2022 a certain portion of vehicles were identified to have been repaired prior to recall launch. As a result, these vehicles were removed from the VIN population and the recall population was updated on June 29, 2022 (Amendment 4). Concurrently, 25,844 GLC300 vehicles were identified as not being included as part of the original P573 report due to a clerical error. These vehicles were included in the overall population in the original P573 submission and were able to be identified via the public VIN lookup tool.