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Mercedes-Benz Part 573 Submission

Original Submitted to Portal December 23, 2022

Chronology-Only section

Supplement to Original Submission

Chronology of Defect/Noncompliance Determination Supplement for ODI 22-00855-28895-10

In June 2018, Mercedes-Benz AG became aware of isolated customer complaints outside the U.S. associated with potential water penetration into the rear interior area of certain Mercedes-Benz vehicles. The company initiated analyses of these customer complaints beginning in June 2018. Several vehicles involved in the field complaints were obtained for examination at Mercedes-Benz AG's facilities in Germany. These analyses identified no indications of a systematic failure that could account for water penetration into the rear of the vehicles or failure of equipment such as the fuel pump control unit.

Nevertheless, in February 2019, Mercedes-Benz AG instructed relevant departments to further investigate and attempt to identify the cause of the complaints. Whether and how water might penetrate into the spare wheel well, and whether any such water ingress might affect the operation of other vehicle equipment are difficult and complex questions, involving many variables and unknown factors.

In March 2019, the company became aware of field complaints in the U.S. involving water penetration into the rear interior. Accordingly, it initiated further tests in June 2019 to analyze such water infiltration and its potential consequences. Mercedes-Benz continued these analyses through November 2019, including evaluating whether different vehicle models or configurations may influence potential water infiltration. The Company conducted analyses to determine if water that entered the spare wheel well might come into contact with the fuel pump control unit, which is also positioned in that area of the vehicle, testing scenarios involving different control unit installation positions within the spare wheel well.

Continuing its investigation in 2020, Mercedes-Benz analyzed whether development or production deviations, customer uses, or different ambient conditions might contribute to water infiltration into the vehicles. Using collected field data, Mercedes-Benz developed a detailed estimate of when in a vehicle's life and under what conditions water infiltration to the spare wheel well might occur. In parallel, Mercedes-Benz AG continued field analyses of limited individual field complaints.

From March to October 2021, Mercedes-Benz re-evaluated all available studies, field complaint data and driving test data to determine whether water infiltration in the affected vehicles posed a risk to the fuel supply to the engine (possibly through a fuel pump control unit failure). Mercedes-Benz simultaneously initiated research to develop potential remedies to eliminate the risk that a fuel pump control unit could come into contact with water in the spare wheel well.

In early 2022, the detailed forecast of potential occurrences based on vehicles' useful life and ambient conditions was updated to incorporate all known complaints involving water infiltration into the rear interior of potentially affected vehicles. From April to September 2022, Mercedes-Benz categorized all information regarding field complaints and dealer correspondence, to evaluate potential consequences associated with water accumulation in the spare wheel well. As part of that review, Mercedes-Benz determined that in some instances vehicles could lose propulsion without advance warning to the driver. In October-November 2022, Mercedes-Benz integrated these analyses with all prior investigations and studies and analyzed potential correlations between production periods and complaints.

Based on all of those analyses, MBAG determined on December 16, 2022 that a potential safety risk associated with the issue cannot be ruled out and decided to conduct a recall.

MBAG is currently aware of 773 warranty claims, field reports, and service reports in the US from March 28, 2019 to December 15, 2022. These warranty claims/field reports/service reports represent approximately 0.24% of the recall population. MBAG is not aware of any deaths, injuries, crashes or property damage claims related to this defect in the USA