During the development of a different vehicle platform (447 platform) in March 2023, it was found that the transfer of a software coding parameter from a passenger car application to a van application might not be applicable for all variants of the van application. Vans can be ordered with a wide range of different combinations of equipment, sensors, and options. Each combination requires evaluation to understand the impact of the software transfer. From April until October 2023, MBAG manually evaluated each combination on an option code and model line level, including reviewing the 16 different instrument cluster variations. MBAG began evaluating any worldwide requirements that might be applicable. Consideration continued through the end of 2023 and the issue was brought to the attention of the regulatory team in early 2024.

Within the purview of the regulatory process, MBAG undertook a further detailed technical investigation starting in February 2024 to evaluate the various combinations of equipment, sensors and options and their impact on illumination of the instrument cluster. In particular, from March to August 2024 MBAG explored the various and potentially differing boundary conditions under which the brightness might stay illuminated and/or might remain at a steady level. MBAG also analyzed the potential impact of different rain/light sensors. In parallel, it was investigated if the automatic brightness adjustment function would compensate for any deviation that might implicate compliance considerations. MBAG is not aware of any customer complaints or incidents relating to the illumination of the instrument cluster in the subject vehicles.

From September 2024 onwards, MBAG evaluated which particular vehicles might be deviating from regulatory requirements. Based on this, the potentially affected vehicles were identified. On December 6, 2024, MBAG concluded that a potential noncompliance with FMVSS 101 cannot be ruled out. A decision was made to conduct a recall to update the coding of the software on the potentially impacted vehicles.