

Part 573 Safety Recall Report

25V-023

Manufacturer Name : Mercedes-Benz USA, LLC**Submission Date :** JAN 29, 2025**NHTSA Recall No. :** 25V-023**Manufacturer Recall No. :** NR**Manufacturer Information :****Population :**

Manufacturer Name : Mercedes-Benz USA, LLC

Number of potentially involved : 165

Address : 13470 International Parkway

Estimated percentage with defect : 100 %

Jacksonville FL 32218

Company phone : 1-877-496-3691

Vehicle Information :

Vehicle 1 : 2018-2018 Mercedes-Benz E 400 Cabriolet

Vehicle Type : LIGHT VEHICLES

Body Style : 2-DOOR

Power Train : GAS

Descriptive Information : Mercedes-Benz Model Year 2018 E 400 Cabriolet 47 vehicles. The recall population was determined through production records. Vehicles outside the recall population have tires with correct maximum permissible tire pressure markings.

Production Dates : MAY 04, 2017 - JAN 24, 2019

VIN Range 1 : Begin :

NR

End : NR

 Not sequential

Vehicle 2 : 2018-2018 Mercedes-Benz E 400 Coupe

Vehicle Type : LIGHT VEHICLES

Body Style : 2-DOOR

Power Train : GAS

Descriptive Information : Mercedes-Benz Model Year 2018 E 400 Coupe 34 vehicles. The recall population was determined through production records. Vehicles outside the recall population have tires with correct maximum permissible tire pressure markings.

Production Dates : MAY 04, 2017 - JAN 24, 2019

VIN Range 1 : Begin :

NR

End : NR

 Not sequential

Vehicle 3 : 2019-2019 Mercedes-Benz E 450 Cabriolet

Vehicle Type : LIGHT VEHICLES

Body Style : 2-DOOR

Power Train : GAS

Descriptive Information : Mercedes-Benz Model Year 2019 E 450 Cabriolet 53 vehicles. The recall population was determined through production records. Vehicles outside the recall population have tires with correct maximum permissible tire pressure markings.

Production Dates : MAY 04, 2017 - JAN 24, 2019

VIN Range 1 : Begin :

NR

End : NR

Not sequential

Vehicle 4 : 2019-2019 Mercedes-Benz E 450 Coupe

Vehicle Type : LIGHT VEHICLES

Body Style : 2-DOOR

Power Train : GAS

Descriptive Information : Mercedes-Benz Model Year 2019 E 450 Coupe 31 vehicles. The recall population was determined through production records. Vehicles outside the recall population have tires with correct maximum permissible tire pressure markings.

Production Dates : MAY 04, 2017 - JAN 24, 2019

VIN Range 1 : Begin :

NR

End : NR

Not sequential

Description of Noncompliance :

Description of the Noncompliance : Mercedes-Benz AG ("MBAG"), the manufacturer of Mercedes-Benz vehicles, has determined that on certain Model Year ("MY") 2018-2019 E-Class Coupe and Cabriolet (238 platform) vehicles, the maximum permissible inflation pressure on the original equipment tires was marked incorrectly. The tires were designed and engineered as having a maximum inflation pressure of 350 kPa, for which the tires meet regulatory requirements, but were marked as having a maximum permissible inflation pressure of 340 kPa. The tires therefore do not comply with FMVSS 139, S5.5(c), which requires that tires be marked with the correct maximum permissible inflation pressure. Additionally, due to the mislabeling, the tires were subject to a different strength requirement under FMVSS 109, which the tires were not designed to satisfy.

FMVSS 1 : 139 - New pneumatic radial tires for light vehicles

FMVSS 2 : NR

Description of the Safety Risk : The strength test requirements of FMVSS 109 applicable to tires with a maximum permissible inflation pressure of 340 kPa might not be met. If the tires do not meet the minimum breaking energy level specified in FMVSS 109, the risk of a crash might be increased.

Description of the Cause : Due to a production deviation at the supplier, a certain batch of Pirelli Cinturato tires were marked with a maximum permissible inflation pressure of 340 kPa, despite being engineered to have a higher maximum inflation pressure of 350 kPa.

Identification of Any Warning NR
that can Occur :

Involved Components :

Component Name 1 : Pirelli P7 Cinturato radial tires (tire size 245/4

Component Description : Pirelli P7 Cinturato radial tires (tire size 245/45 R 18 100 Y)

Component Part Number : TIN: 93 4J T791 1417 0519

Supplier Identification :

Component Manufacturer

Name : Pirelli Tire, LLC

Address : 100 Pirelli Drive
Rome Georgia 30161

Country : United States

Chronology :

On January 15, 2019, Daimler AG [“DAG”] now known as MBAG] received information from the Korean authority (KATRI) that when testing a Pirelli Cinturato tire (tire size 245/45R18 100 Y) installed on a Mercedes vehicle, the tire reportedly did not meet the performance requirements for the plunger test per KSM 6750 when carried out with the test specifications applicable for the maximum tire pressure marked on the tire. DAG (MBAG) informed Pirelli Deutschland GmbH about the testing result on January 18, 2019.

Representatives of DAG (MBAG), Pirelli and KATRI reviewed the test methodology used by KATRI and Pirelli found that the tires had been incorrectly marked with a maximum tire pressure of 340 kPa instead of 350 kPa. On February 26, 2019, Pirelli informed DAG (MBAG) that it had determined that the tires did not comply with the marking requirements of FMVSS 139, S5.5, but that it believed the discrepancy does not present a safety risk because the tires had been designed and engineered to withstand a maximum permissible inflation pressure of 350 kPa, and met all applicable requirements for tires with a maximum permissible inflation pressure of 350 kPa.

DAG (MBAG) determined that this noncompliance was inconsequential as it relates to motor vehicle safety, and submitted a petition for inconsequential noncompliance on March 27, 2019.

On December 7, 2022, NHTSA notified MBAG that it intended to deny MBAG’s petition for inconsequentiality. Subsequently, on December 9, 2022, the denial was published in the Federal Register. Pirelli filed an appeal of

that denial on December 20, 2022. MBAG filed a request for a stay of its related recall pending a decision on the appeal, which NHTSA allowed.

The Pirelli appeal was denied by NHTSA on January 10, 2025. Consequently, MBAG is submitting a new Noncompliance Information Report on January 17, 2025. MBAG will conduct a recall to remedy affected vehicles.

See chronology supplement.

Description of Remedy :

Description of Remedy Program : As a precautionary measure, an authorized Mercedes-Benz dealer will check the tires on the affected vehicles and replace them, if original equipment.

The tires subject to this noncompliance may have been replaced by the customer due to normal wear during the pendency of NHTSA's decision regarding the inconsequentiality petition and appeal. MBUSA has received no reports or customer complaints suggesting that any subject tires were replaced as a result of the labeling error. Accordingly, MBUSA intends to address individual customer circumstances on a case-by-case basis rather than through its general reimbursement program.

How Remedy Component Differs from Recalled Component : Vehicles outside the recall population have tires with correct maximum permissible tire pressure markings.

Remedy Part No: Pirelli P7 Cinturato radial tires (tire size 245/45 R18 100Y XL MOE) A 000 401 94 03

Identify How/When Recall Condition was Corrected in Production : A change in the production procedure at the supplier ensures that this issue can no longer occur from January 25, 2019 onwards.

Recall Schedule :

Description of Recall Schedule : Dealers will be notified of the pending voluntary recall campaign on January 24, 2025. Owners will be notified of the voluntary recall campaign before March 18, 2025. A copy of all communications will be provided when available.

Planned Dealer Notification Date : JAN 24, 2025 - NR

Planned Owner Notification Date : MAR 18, 2025 - NR

* NR - Not Reported