#### OMB Control No.: 2127-0004

# Part 573 Safety Recall Report

## 19V-648

Manufacturer Name: Mercedes-Benz USA, LLC.

**Submission Date:** NOV 07, 2019 **NHTSA Recall No.:** 19V-648

**Manufacturer Recall No.:** NR



### **Manufacturer Information:**

Manufacturer Name: Mercedes-Benz USA, LLC.

Address: 13470 International Parkway

Jacksonville FL 32218

Company phone: 1-877-496-3691

## **Population:**

Number of potentially involved: 1,478 Estimated percentage with defect: 100 %

## **Vehicle Information:**

Vehicle 1: 2020-2020 Mercedes-Benz GLE 450 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : SUV Power Train : GAS

Descriptive Information: 167.159 FB5K 312 Vehicles

The recall population was determined through production records. Vehicles outside

of the recall population have the correct owner's manual included.

Production Dates: JUL 13, 2018 - AUG 30, 2019

Vehicle 2: 2020-2020 Mercedes-Benz GLE 350 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive Information: 167.149 FB4K 1166 vehicles

The recall population was determined through production records. Vehicles outside

of the recall population have the correct owner's manual included.

Production Dates: JUL 13, 2018 - AUG 30, 2019

VIN Range 1: Begin: 4JGFB4KE0LA007268 End: 4JGFB5KEXLA041983 ✓ Not sequential

## **Description of Noncompliance:**

Description of the Daimler AG ("DAG"), the manufacturer of Mercedes-Benz vehicles, has

Noncompliance: determined that on certain Model Year ("MY") 2020 GLE-Class vehicles (167

platform) the owner's manuals do not include information specific to the adjustment of the head restraints of the third row seats, as required by local

regulatory requirements (FMVSS 202a, S4.7.2(d)).

FMVSS 1: 202 - Head restraints

FMVSS 2: NR

Description of the Safety Risk: The owner's manual is intended to provide information to the occupant about

the appropriate adjustment and operation of head restraints. The owner's manuals for the subject population do not include a description specific to the third row seats. Occupants may not understand how to properly adjust the third row head restraints without the required description, increasing the

risk of injury.

Description of the Cause: The missing documentation resulted from advancing the originally planned

implementation date of the third row seating.

Identification of Any Warning The occupant would be aware to adjust the head restraints due to the

that can Occur: ergonomic design.

## **Supplier Identification:**

#### **Component Manufacturer**

Name: NR Address: NR

NR

Country: NR

## **Chronology:**

In Spring 2019, during launch of the model year 2020 GLE-class, DAG discovered that the ECE-specific user manual does not include information specific to the use of the head restraints of the third seat row.

Investigations were initiated to check the nine other market specific owner's manuals for compliance with local laws or regulations. It was determined that, although the owner's manuals contained the general description of the adjustment and operation of the head restraints, they did not contain information specific to the head restraints in the third row of seats.

DAG also determined that the advanced introduction of the third row of seats resulted in documentation errors and the oversight. Additionally, further analyses were performed to determine the impact of the missing information of the 3rd row head restraints on occupant safety. This was determined not to be the case since the customer is informed about the correct adjustment and use of the head restraints by the general explanations

of the head restraints in the user manual.

Furthermore, the occupant would be made aware of a potential misadjustment by the ergonomic design of the 3rd row head restraints.

On August 30, 2019, DAG decided to conduct a noncompliance safety recall.

## **Description of Remedy:**

Description of Remedy Program: As a precautionary measure, an authorized Mercedes-Benz dealer will

provide a supplementary owner's manual booklet with the necessary

information.

Pursuant to 49 C.F.R. § 577.11(e), MBUSA does not plan to provide notice

about pre-notice reimbursement to owners since all involved vehicles

remain covered under the new vehicle warranty.

How Remedy Component Differs 3rd row headrest supplementary booklet (# A167 584 64 06) includes the

from Recalled Component: required information

Identify How/When Recall Condition In response to the ECE-based discovery, all owner's manuals globally were

was Corrected in Production: updated in production on April 15, 2019.

#### **Recall Schedule:**

Description of Recall Schedule: Dealers will be notified of the pending voluntary recall campaign on

September 17, 2019. Owners will be notified of the recall via interim

letter on November 4, 2019. A copy of all communications will be

provided when available.

Planned Dealer Notification Date : SEP 17, 2019 - NR

Planned Owner Notification Date: NOV 04, 2019 - NR

<sup>\*</sup> NR - Not Reported