OMB Control No.: 2127-0004

Part 573 Safety Recall Report

20V-068

Manufacturer Name: Mercedes-Benz USA, LLC.

Submission Date: APR 02, 2020 **NHTSA Recall No.:** 20V-068 **Manufacturer Recall No.:** 2020030016



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: 239 Estimated percentage with defect: 100 %

Vehicle Information:

Vehicle 1: 2020-2020 Mercedes-Benz C300 Cabrio

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 205.483 WK8D1 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDDWK8DB9LF959788 End: WDDWK8DB9LF959788 ✓ Not sequential

Vehicle 2: 2020-2020 Mercedes-Benz AMG GT63S 4-Door 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : 4-DOOR Power Train : GAS

Descriptive Information: 290.689 7X8K 1 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1:Begin: WDD7X8KB4LA013152 End: WDD7X8KB4LA013152 ✓ Not sequential

Vehicle 3: 2020-2020 Mercedes-Benz C300 Coupe

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 205.383 WJ8D 2 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDDWJ8DB4LF960088 End: WDDWJ8DBXLF956790 ✓ Not sequential

Vehicle 4: 2020-2020 Mercedes-Benz C43 AMG Cabrio 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 205.464 WK6E2 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDDWK6EB1LF959688 End: WDDWK6EB8LF959770 ✓ Not sequential

Vehicle 5: 2020-2020 Mercedes-Benz C43 AMG Coupe 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 205.364 WJ6E 1 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDDWJ6EB1LF959614 End: WDDWJ6EB1LF959614 ✓ Not sequential

Vehicle 6: 2020-2020 Mercedes-Benz C63S AMG Cabrio Vehicle Type: LIGHT VEHICLES Body Style: 2-DOOR Power Train: GAS Descriptive Information: 205.487 WK8H1 Vehicles The recall population was determined through production records. Vehicles outside of the recall population are equipped with an emergency call (eCall) system communications module that correctly transmits the vehicle's GPS coordinates. Production Dates: AUG 19, 2019 - SEP 02, 2019 VIN Range 1: Begin: WDDWK8HB4LF960826 End: WDDWK8HB4LF960826 ✓ Not sequential Vehicle 7: 2020-2020 Mercedes-Benz CLS53 AMG 4MATIC Vehicle Type: LIGHT VEHICLES Body Style: 4-DOOR Power Train: GAS Descriptive Information: 257.361 2J6B 1 Vehicles The recall population was determined through production records. Vehicles outside of the recall population are equipped with an emergency call (eCall) system communications module that correctly transmits the vehicle's GPS coordinates. Production Dates: AUG 19, 2019 - SEP 02, 2019 VIN Range 1: Begin: WDD2J6BB6LA051241 End: WDD2J6BB6LA051241 ✓ Not sequential Vehicle 8: 2020-2020 Mercedes-Benz E350 Vehicle Type: LIGHT VEHICLES Body Style: 4-DOOR Power Train: GAS Descriptive Information: 213.083 ZF8D 9 Vehicles The recall population was determined through production records. Vehicles outside of the recall population are equipped with an emergency call (eCall) system communications module that correctly transmits the vehicle's GPS coordinates. Production Dates: AUG 19, 2019 - SEP 02, 2019 VIN Range 1: Begin: WDDZF8DB0LA730477 End: WDDZF8DBXLA730504 Not sequential

Vehicle 9: 2020-2020 Mercedes-Benz E350 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : 4-DOOR Power Train : GAS

Descriptive Information: 213.084 ZF8E 6 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDDZF8EB0LA728775 End: WDDZF8EBXLA730548 ✓ Not sequential

Vehicle 10: 2020-2020 Mercedes-Benz E450 Cabrio

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 238.467 1K6H 12 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDD1K6HB1LF125703 End: WDD1K6HBXLF125876 ✓ Not sequential

Vehicle 11: 2020-2020 Mercedes-Benz E450 Cabrio 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 238.468 1K6J 7 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDD1K6JB0LF124830 End: WDD1K6JB6LF124833 ✓ Not sequential

Vehicle 12: 2020-2020 Mercedes-Benz E450 Coupe

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 238.367 1J6H 1 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDD1J6HB1LF125512 End: WDD1J6HB1LF125512 ✓ Not sequential

Vehicle 13: 2020-2020 Mercedes-Benz E450 Coupe 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 238.368 1J6J 1 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDD1J6JB6LF125824 End: WDD1J6JB6LF125824 ✓ Not sequential

Vehicle 14: 2020-2020 Mercedes-Benz E450 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style: 4-DOOR Power Train: GAS

Descriptive Information: 213.068 ZF6J 2 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDDZF6JB7LA729402 End: WDDZF6JBXLA727966 ✓ Not sequential

Vehicle 15: 2020-2020 Mercedes-Benz E53 AMG Cabrio 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: 238.461 1K6B 3 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDD1K6BB4LF125722 End: WDD1K6BB7LF125696 ✓ Not sequential

Vehicle 16: 2020-2020 Mercedes-Benz GLC300 Coupe 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive Information: 253.384 0J8E 16 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDC0J8EB0LF717970 End: WDC0J8EBXLF719497 ✓ Not sequential

Vehicle 17: 2020-2020 Mercedes-Benz GLC300

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive Information: 253.983 0G8D 14 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDC0G8DB1LF714852 End: WDC0G8DBXLF719239 ✓ Not sequential

Vehicle 18: 2020-2020 Mercedes-Benz GLC300 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive Information: 253.984 0G8E 153 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDC0G8EB0LF717269 End: WDC0G8EBXLF721054 ✓ Not sequential

Vehicle 19: 2020-2020 Mercedes-Benz GLC63 AMG Coupe 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style: SUV Power Train: GAS

Descriptive Information: 253.388 0J8J 1 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDC0J8JB2LF714851 End: WDC0J8JB2LF714851 ✓ Not sequential

Vehicle 20: 2020-2020 Mercedes-Benz AMG GT63 4-Door 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style : 4-DOOR Power Train : GAS

Descriptive Information: 290.688 7X8J 2 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDD7X8JB5LA013131 End: WDD7X8JB7LA013440 ✓ Not sequential

Vehicle 21: 2020-2020 Mercedes-Benz C300 Cabrio 4MATIC

Vehicle Type: LIGHT VEHICLES

Body Style: 2-DOOR Power Train: GAS

Descriptive Information: 205.484 WK8E3 Vehicles

The recall population was determined through production records.

Vehicles outside of the recall population are equipped with an emergency call (eCall)

system communications module that correctly transmits the vehicle's GPS

coordinates.

Production Dates: AUG 19, 2019 - SEP 02, 2019

VIN Range 1: Begin: WDDWK8EB5LF960628 End: WDDWK8EB9LF960695 ✓ Not sequential

Description of Defect:

Description of the Defect: Mercedes-Benz AG ("MBAG"), the manufacturer of Mercedes-Benz vehicles, has

determined that on certain Model Year ("MY") 2020 C-class (205 platform), E-Class (213 platform), E-Class Coupe, (238 platform), GLC-Class (253 platform), CLS-Class (257 platform) and GT-Class (290 platform) vehicles, an electrical circuit in the communication module for the emergency call system (eCall) may be damaged. This could lead to an impairment of the communication module's

GPS functionality.

FMVSS 1: NR FMVSS 2: NR

Description of the Safety Risk: If the electrical circuit in the eCall communications module is damaged, the

GPS based localization data may be incorrect or missing. Activation of the vehicle's emergency call feature would perform as intended, however, it is possible that emergency responders could be provided with incorrect GPS coordinates. This might increase the risk of an injury following an emergency

event.

Description of the Cause: Due to a production deviation at a supplier, a certain batch of communication

modules could have a damaged internal electrical circuits in the eCall module.

Identification of Any Warning The customer will not receive an advance warning due to the nature of the

that can Occur: failure mechanism.

Involved Components:

Component Name 1: NR Component Description: NR Component Part Number: NR

Supplier Identification:

Component Manufacturer

Name: Continental Automotive Hungary Kft

Address: Napmátka u. 6

Budapest FOREIGN STATES H-1106

Country: Hungary

Chronology:

At the end of August 2019, MBAG launched initial investigations based on information provided by the supplier. During end of line production testing of communication modules for the emergency call system (eCall), the supplier identified a number of communication modules in a batch that were not built according to current production specifications. MBAG and the supplier initiated a joint investigation and found that the affected batch of parts was produced during a specific shift on August 08, 2019. The defective parts were identified and scrapped as a consequence. MBAG and the supplier then conducted further testing and analysis in Fall 2019 to assess the performance of parts that did pass the criteria at end of line testing. The objective of this further testing was to understand whether the remaining modules produced during the affected shift that had passed end of line testing would continue to operate as intended over their lifetime. Simultaneously, MBAG evaluated the potential consequences of a failed electrical circuit on the communication module's GPS functionality. The parts analysis indicated that there was a potential that even if the electrical circuit passed end of line testing, it could not be guaranteed that its performance may be impaired over time. MBAG is not aware of any reports related to this issue, but decided to conduct a recall as a precautionary measure on January 31, 2020.

Description of Remedy:

Description of Remedy Program: An authorized Mercedes-Benz dealer will replace the communication module on the affected vehicles.

> Pursuant to 49 C.F.R. § 577.11(e), MBUSA does not plan to provide notice about pre-notice reimbursement to owners since none of the involved vehicles would have been previously subject to the condition described and all remain covered under the new vehicle warranty.

How Remedy Component Differs Communication module produced according to current production

from Recalled Component: specifications.

Part No: Steuergerät HERME A1679004912

Identify How/When Recall Condition A change in the production procedure of our supplier ensures that this

was Corrected in Production: issue can no longer occur from Sep 09, 2019 onwards.

Recall Schedule:

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

February 14, 2020. Owners will be notified of the voluntary recall campaign via interim letter on March 23, 2020. A copy of all

communications will be provided when available.

Planned Dealer Notification Date : $\ FEB\ 14,2020\ -\ NR$

Planned Owner Notification Date : MAR 23, 2020 - NR

^{*} NR - Not Reported