

Chronology of Defect/Noncompliance Determination

In September 2019, Mercedes-Benz USA provided information to MBAG's Aftersales Department that it had received reports from the field that the seatbelt buckle for the middle rear seat were found under the seat cushion. There were nine cases reported to MBAG at the time and the reports indicated that customers were bringing their vehicles to dealers in order to retrieve the seatbelt buckle from under the seat cushion.

MBAG considered the individual reports and in January 2020, MBAG initiated an investigation to better understand the condition and potential consequences. In the Spring of 2020, MBAG operations were restricted due to the COVID-19 pandemic. When the investigation resumed, the analysis focused on the likelihood that the middle seatbelt buckle could be pushed below the seat cushion and the scenarios and conditions for the cause. It was found that due to the double buckle configuration, the buckle for the middle seat occupant could end up under the seat in certain specific circumstances – if the middle seat occupant did not use two hands to latch the buckle or, if the buckle was forcefully pushed downward under the seat cushion.

MBAG again reviewed its data related to the condition and while the overall number of reports remained low, it was observed that dealer technicians were using a variety of different repair methods. In September 2020, MBAG conducted an analysis of whether and how the buckle could be retrieved if it was pushed below the seat cushion. MBAG conducted simulations with employees where the middle seat buckle was intentionally pushed below the seat cushion. The employees were not advised of the condition ahead of time and were instructed to sit in the second row middle seat and buckle the seatbelt. In most of the cases, the occupant was able to reach below the cushion and retrieve the buckle quickly on the first attempt. Based on the fact that the majority of cases were from the US, the company reviewed the issue with NHTSA's Office of Defects Investigation on October 8, 2020, to discuss the condition and obtain feedback on the company's proposed approach.

On October 19, 2020, NHTSA advised that in its view, the issue should be addressed via a safety recall. Based on the discussion with the agency and a review of the topic, MBAG made the decision to conduct a safety recall on October 23, 2020.