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

# Part 573 Safety Recall Report

# 21V-197

Manufacturer Name: Mercedes-Benz USA, LLC

Submission Date: MAR 26, 2021 NHTSA Recall No.: 21V-197 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 : 15,096Estimated percentage with defect : 100%

#### **Vehicle Information:**

Vehicle 1: 2017-2020 Mercedes-Benz C300 Coupe

Vehicle Type: LIGHT VEHICLES

Body Style : 2-DOOR Power Train : GAS

Descriptive Information: Mercedes-Benz 2017-2020 C300 Coupe 679 Vehicles. The recall population was

determined through warranty records. Vehicles outside of the recall have not had a

prior service repair.

Production Dates: FEB 19, 2013 - AUG 04, 2020

Vehicle 2: 2015-2020 Mercedes-Benz C300

Vehicle Type: LIGHT VEHICLES

Body Style : 4-DOOR Power Train : GAS

Descriptive Information: Mercedes-Benz 2015-2020 C300 8875 Vehicles. The recall population was

determined through warranty records. Vehicles outside of the recall have not had a

prior service repair.

Production Dates: FEB 19, 2013 - AUG 04, 2020

Vehicle 3:	2016-2018 Mer	cedes-Benz C35	60e				
	LIGHT VEHICLES						
Body Style :							
ŭ ŭ	HYBRID ELECTI	RIC					
Descriptive Information :			∩ <sub>≏</sub> 112	Vehicles The	recall nonulation was		
Descriptive information.		ough warranty i			de of the recall have not had a		
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
Vehicle 4:	2015-2015 Mer	cedes-Benz C40	00				
Vehicle Type :	LIGHT VEHICLE	S					
Body Style :	4-DOOR						
Power Train :	GAS						
Descriptive Information :	Mercedes-Benz 2015 C400 138 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
Vehicle 5:	2017-2020 Mercedes-Benz C43 Coupe AMG						
Vehicle Type :	LIGHT VEHICLE	S					
Body Style :	2-DOOR						
Power Train :	GAS						
Descriptive Information :	Mercedes-Benz 2017-2020 C43 Coupe AMG 74 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
Vehicle 6:	2017-2020 Mer	cedes-Benz C43	<b>AMG</b>				
V 1	LIGHT VEHICLES						
Body Style :							
Power Train :	GAS						
Descriptive Information : Mercedes-Benz 2017-2020 C43 AMG 180 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.							
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:	Begin :	NR	End:	NR	☐ Not sequential		

			50			
	Mercedes-Benz 2016 C450 217 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.					
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020				
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential	
	GAS	S		36 Vehicles. Tl	he recall population was	
•	determined through warranty records. Vehicles outside of the recall have not had a prior service repair.					
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020				
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential	
			A250 Co	upe		
	Mercedes-Benz 2014-2019 CLA250 Coupe 1968 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.					
Production Dates :	FEB 19, 2013 - A	UG 04, 2020				
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential	
			A45 AM0	T.		
Descriptive Information : Mercedes-Benz 2014-2015 CLA45 AMG 44 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates: FEB 19, 2013 - AUG 04, 2020						
VIN Range 1:	Begin :	NR	End:	NR	☐ Not sequential	

			A45 Cou	pe AMG			
	Mercedes-Benz 2016-2018 CLA45 Coupe AMG 23 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates :	FEB 19, 2013 - A	AUG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
	GAS	ES		06 Vehicles. The r	ecall population was		
•	determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates :	FEB 19, 2013 - A						
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
Vehicle Type : Body Style : Power Train :							
•	through warranty records. Vehicles outside of the recall have not had a prior service repair.						
<b>Production Dates:</b>	FEB 19, 2013 - A	AUG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
			C300				
Descriptive Information : Mercedes-Benz 2016-2020 GLC300 765 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.							
Production Dates: FEB 19, 2013 - AUG 04, 2020							
VIN Range 1:		NR	End:	NR	☐ Not sequential		

Vehicle 15:	2017-2019 Mer	cedes-Benz GLO	C43 AM	G			
	LIGHT VEHICLES						
Body Style :							
Power Train:							
		2017-2019 CI (	'43 AM	C 32 Vehicles. The recall n	onulation was		
Descriptive information.	Mercedes-Benz 2017-2019 GLC43 AMG 32 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	■ Not sequential		
					_		
Vehicle 16:	2018-2018 Mer	cedes-Benz GLO	C63 AM	G			
Vehicle Type :	LIGHT VEHICLE	S					
Body Style :	SUV						
Power Train:	GAS						
Descriptive Information :	Mercedes-Benz 2018 GLC63 AMG 1 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates :	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:	Begin :	NR	End:	NR	☐ Not sequential		
Vehicle 17:	2015-2015 Mercedes-Benz S65 AMG						
Vehicle Type :	LIGHT VEHICLE	LIGHT VEHICLES					
Body Style :	4-DOOR						
Power Train :	GAS						
Descriptive Information :	Mercedes-Benz 2015 S65 AMG 7 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates :	FEB 19. 2013 - A	UG 04. 2020					
VIN Range 1:		NR	End:	NR	Not sequential		
Vehicle 18:	2014-2020 Mer	cedes-Benz S63	AMG				
Vehicle Type :	LIGHT VEHICLE	S					
Body Style :	4-DOOR						
Power Train :	GAS						
Descriptive Information :	Mercedes-Benz	2014-2020 S63	AMG 5	2 Vehicles. The recall pop	ulation was		
1	determined thro	ough warranty i		. Vehicles outside of the re			
prior service repair.							
Production Dates : FEB 19, 2013 - AUG 04, 2020							
VIN Range 1:	Begin :	NR	End:	NR	■ Not sequential		

Vehicle 19:	2015-2016 Mer	cedes-Benz S60	0				
Vehicle Type :	LIGHT VEHICLES						
Body Style :							
Power Train :	GAS						
Descriptive Information :	Mercedes-Benz	2015-2016 S60	00 21 Ve	hicles. The r	ecall population was determined		
·					ecall have not had a prior service		
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:		NR	End:	NR	☐ Not sequential		
Vehicle 20:	2018-2019 Mer	cedes-Benz S56	0				
Vehicle Type :	LIGHT VEHICLE	S					
Body Style :	4-DOOR						
Power Train :	GAS						
Descriptive Information :	Mercedes-Benz 2018-2019 S560 9 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
<b>Production Dates:</b>	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:		NR	End:	NR	☐ Not sequential		
	2014-2017 Mer		0				
V -	LIGHT VEHICLE	S					
Body Style :							
Power Train :							
Descriptive Information :	Mercedes-Benz 2014-2017 S550 1228 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates :	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:		NR	End:	NR	☐ Not sequential		
	C				_ ,		
Vehicle 22:	2018-2020 Mer	cedes-Benz S45	0				
Vehicle Type :	LIGHT VEHICLES						
Body Style :	4-DOOR						
Power Train :	GAS						
Descriptive Information :	Information: Mercedes-Benz 2018-2020 S450 10 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates: FEB 19, 2013 - AUG 04, 2020							
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		

			E63 Cou	pe AMG			
Descriptive Information :	Mercedes-Benz 2016-2019 GLE63 Coupe AMG 32 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
<b>Production Dates:</b>	FEB 19, 2013 - A	AUG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
	GAS	S			pulation was		
•	determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates :	FEB 19, 2013 - A	AUG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	■ Not sequential		
			E43 Cou	pe AMG			
	Mercedes-Benz 2017-2019 GLE43 Coupe AMG 83 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
Production Dates :	FEB 19, 2013 - A	UG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	☐ Not sequential		
Vehicle Type : Body Style :	2019-2019 Mer LIGHT VEHICLE SUV HYBRID ELECTI	SS	C350e				
Descriptive Information :	: Mercedes-Benz 2019 GLC350e 4 Vehicles. The recall population was determined through warranty records. Vehicles outside of the recall have not had a prior service repair.						
<b>Production Dates:</b>	FEB 19, 2013 - A	AUG 04, 2020					
VIN Range 1:	Begin:	NR	End:	NR	■ 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") 2014 – 2020 CLA-Class, GLA-Class, C-Class, S-Class, GLC-Class, and GLE-Class Coupe (117, 156, 205, 222, 253, and 292 platform, respectively) vehicles with a panoramic sunroof, the stationary roof panel located between the windshield and the panoramic sunroof may not have been bonded correctly to the vehicle during a prior

repair.

FMVSS 1: NR FMVSS 2: NR

Description of the Safety Risk: In this case, the adhesion of the front panel to the vehicle body might

deteriorate gradually over time and could result in the front panel to partially or fully detach from the vehicle, increasing the risk of a crash and/or injury

for other road users.

Description of the Cause: Due to a deviation in the workshop repair process, the front panels may not

have been bonded according to specifications during a prior repair

Identification of Any Warning When the adhesion begins to deteriorate, the customer might observe a

that can Occur: partially detached panel or excessive wind noises in the area of the sunroof

while driving.

### **Involved Components:**

Component Name 1 : Cover OSR
Component Description : Cover OSR

Component Part Number: A1177800022, A1567801200, A2057800022, A2057803300, A2227800022,

A2227806200, A2927800900

# **Supplier Identification:**

#### **Component Manufacturer**

Name: Mercedes-Benz AG

Address: NR

NR

Country: NR

#### **Chronology:**

In June 2020, NHTSA raised two VOQs to Mercedes-Benz describing instances in which the front roof panel forward of the panoramic sunroof had allegedly detached from the vehicle while it was traveling at highway speeds. MBAG launched an investigation and was able to verify from its internal documentation that in both cases the incorrect adhesive was used to bond the panels during a previous repair. MBAG also began to analyze its internal data related to detachment of the front roof panel to understand whether the incidents were indicative of a broader trend or isolated events and found a number of sporadic reports submitted between 2018 – 2020 involving claims of cracked or partially detached panels. MBAG also observed that all involved vehicles that had also undergone a prior service repair to the front roof panel. MBAG began to analyze whether there was a more systemic issue and whether it was related to a prior repair of the front roof panel. MBAG provided an update to NHTSA in December 2020 and NHTSA opened its Preliminary Investigation in January 2021. MBAG's technical analysis was carried out from late 2020 and into the first quarter of 2021 and included an analysis of possible deviations from the published repair instructions as not all vehicles that had undergone a prior service repair necessarily reported a subsequent issue with the bonding of the panel. Test setups were prepared by recreating various repair scenarios where an incorrect pre-treatment and bonding adhesives other than the specific adhesive that had been approved for this repair. Sample roof panels were also returned from the field and analyzed which indicated how the pre-treatment, cleaning and primer application were actually being applied by Mercedes-Benz workshops and any third-party sublets and confirmed that there were deviations from the repair procedures. Please see updated Chronology Supplement.

# **Description of Remedy:**

Description of Remedy Program: An authorized Mercedes-Benz dealer will remove the bonded panel and

will install a new front panel by following the detailed repair instructions

and using the approved primer, cleaner and adhesive.

Pursuant to 49 C.F.R. § 577.11(e), MBUSA plans to provide notice about pre-notice reimbursement to owners since some of the involved vehicles

would have been previously subject to the condition described.

How Remedy Component Differs Correct installation of the front panel. Cover OSR - A1177800022, from Recalled Component: A1567801200, A2057800022, A2057803300, A2227800022,

A2227806200, A2927800900, A0099898571, A0099897571,

A0059891971, A0009894905

Identify How/When Recall Condition MBAG created a global Service Information to address the potential for was Corrected in Production: improper repair of the front panel. Additionally MBUSA is communicating the topic to its authorized dealers regarding the proper repair procedures. This condition should no longer occur for repairs made as of the recall launch date.

> MBAG and MBUSA continue to evaluate and optimize the parts ordering and other processes to ensure the repair is being performed correctly and ensure only the authorized repair components are used, as well as dealer accountability for the repairs.

#### **Recall Schedule:**

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

March 26, 2021. Owners will be notified of the voluntary recall campaign approximately one week after launch to the dealers on May 14, 2021. A

copy of all communications will be provided when available.

Planned Dealer Notification Date: MAR 26, 2021 - MAY 14, 2021

Planned Owner Notification Date: NR - NR

\* NR - Not Reported