

Beginning in mid-January 2021, MBAG became aware of an isolated field complaint which described that the brightness of multifunction display was not functioning as expected and appeared to be overly bright to this particular consumer. In conjunction with that report, MBAG also became aware of a VOQ (#11389057), which included a similar complaint related to the brightness of the multifunction display and that the consumer had difficulty using the exterior side mirrors because of glare from the instrument cluster. MBAG initiated an investigation and found that the two vehicles were equipped with a "Highline" instrument cluster in combination with an entry-level variant radio or without infotainment system. This combination of equipment suggested a connection between the performance of the multifunction display and these specific vehicle options. As a precautionary measure MBAG prohibited further vehicles from being ordered or produced with this combination of features beginning in February 2021, until the issue could be further analyzed. MBAG also reviewed its internal databases for other potentially related reports from the field and found a small number of isolated reports from the European market had been received in 2020 where the customer described that the instrument cluster could not be dimmed. In some instances, the condition could not be reproduced at the workshop.

On February 8, 2021, NHTSA forwarded to Daimler Vans USA the VOQ noted above and requested the company's feedback on the condition that the customer had reported. Daimler Vans provided an initial response to the inquiry on February 19, 2021 and in the first week of March 2021, it further advised that the company was continuing to conduct its investigation and provided an estimated timeline for completion of its analysis.

Throughout March 2021, MBAG conducted laboratory tests where vehicles were evaluated under various conditions of brightness and darkness. MBAG's analysis excluded the possibility of glare of the side mirrors due to reflections from the instrument cluster, however, after an analysis of the FMVSS 101 requirements related to illumination and brightness, on March 30, 2021, MBAG determined a noncompliance existed in the vehicles.