

# Part 573 Safety Recall Report

# 21V-513

**Manufacturer Name :** Daimler Vans USA, LLC**Submission Date :** OCT 05, 2021**NHTSA Recall No. :** 21V-513**Manufacturer Recall No. :** VS2/VS3 KISIGUR**Manufacturer Information :**

Manufacturer Name : Daimler Vans USA, LLC

Address : One Mercedes-Benz Drive  
Sandy Springs GA 30328

Company phone : 8777628267

**Population :**

Number of potentially involved : 1,514

Estimated percentage with defect : 100 %

**Vehicle Information :**

Vehicle 1 : 2021-2021 Freightliner Sprinter

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : The recall population was determined through production records. Vehicles above 10,000 pounds GVWR are excluded from the recall population as the requirement of FMVSS 208, S7.1.1.5 does not apply to these vehicles.

Production Dates : FEB 16, 2021 - JUN 02, 2021

VIN Range 1 : Begin : NR End : NR

 Not sequential

Vehicle 2 : 2021-2021 Mercedes-Benz SPRINTER

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : The recall population was determined through production records.

Vehicles outside of the recall population have seat belts that meet current production specifications.

Production Dates : FEB 16, 2021 - JUN 02, 2021

VIN Range 1 : Begin : NR End : NR

 Not sequential

Vehicle 3 : 2021-2021 Mercedes-Benz Metris

Vehicle Type :

Body Style :

Power Train : NR

Descriptive Information : The recall population was determined through production records. Vehicles above 10,000 pounds GVWR are excluded from the recall population as the requirement of FMVSS 208, S7.1.1.5 does not apply to these vehicles.

Production Dates : FEB 02, 2021 - MAR 16, 2021

VIN Range 1 : Begin :

NR

End : NR

Not sequential

## Description of Noncompliance :

Description of the Noncompliance : Mercedes-Benz AG ("MBAG"), the manufacturer of Mercedes-Benz and Freightliner vans, has been informed by its supplier Autoliv that it might have been supplied with certain seat belt assemblies manufactured by certain Autoliv Group companies between February 02, 2021 and June 02, 2021, which might not fulfill certain requirements of FMVSS 208.

The potential issue is described by Autoliv in its equipment report as follows: "Autoliv has determined that these seat belt assemblies do not comply with FMVSS 208 S7.1.1.5, which requires each designated seating position except the driver's position to have "a seat belt assembly whose lap belt portion is lockable so that the seat belt assembly can be used to tightly secure a child restraint system." The subject seat belt assemblies have a feature that converts the retractor from an emergency locking retractor (ELR) to an automatic locking retractor (ALR). The seat belts convert to the ALR mode after the webbing has been fully withdrawn from the retractor. The system is designed so that as the seat belt is released into the retractor, the ALR function remains active so a child restraint seat can be tightly secured. However, in certain seat belt assemblies the ALR function deactivates early before the webbing is fully retracted."

FMVSS 1 : 208 - Occupant crash protection

FMVSS 2 : NR

Description of the Safety Risk : The potential impacts are described by Autoliv in its equipment report as follows:

"This noncompliance does not impact the compliance or functionality of the seat belt assemblies with respect to their normal use by adult passengers or use of the LATCH system to secure child restraint seats. With child restraint seats for which the vehicle owner elects to use the seat belt to secure the child restraint seat instead of the LATCH system, even in a braking situation the normal seat belt locking mechanism, or ELR, prevents the seat belt from lengthening and the child restraint seat from moving even if the ALR functions not activated. In addition, in a crash situation, seat belts equipped with pretensioners have the functional equivalent of the ALR function and, as a result, even when the vehicle owner elects to use the seat belt instead of the

LATCH system to secure the child restraint seat, there is no increased risk to the safety of child restraint seat occupants.”

The ALR function automatically retracts and tightens the seat belt when using a child restraint system. According to the supplier, due to a geometric deviation on the sensor lever, the child seat protection function could be deactivated earlier than intended. In this case, the static component requirement according to FMVSS 208 S7.1.1.5 may not be met. According to the NHTSA Recall Acknowledgment document sent to Autoliv (21E-052): “A seat belt retractor that does not function as intended can increase the risk of injury during a crash.”

**Description of the Cause :** The cause of the potential issue is described by Autoliv in its equipment report as follows:

“The subcomponent supplier of the ALR levers used in the subject seat belt assemblies produced dimensionally out of tolerance parts that may cause the ALR to deactivate before the seat belt webbing is fully retracted.”

**Identification of Any Warning that can Occur :** According to Autoliv's equipment report:  
“A vehicle owner who elects to use the seat belt instead of the LATCH system to secure a child restraint seat will notice that the audible clicking noise made when the ALR function is activated stops well before the seat belt webbing is fully retracted.”

## Involved Components :

**Component Name 1 :** Seat belt (VS30)

**Component Description :** SEAT BELT SIDE LWR RH 1.SEAT-ROW USA VAR1

**Component Part Number :** A 907 860 05 00

**Component Name 2 :** Seat belt (VS30)

**Component Description :** SEAT BELT CENTER-SEAT USA

**Component Part Number :** A 907 860 28 00

**Component Name 3 :** Seat belt (VS30)

**Component Description :** SEAT BELT LH RR-SEAT USA

**Component Part Number :** A 907 860 32 00

Component Name 4 : Seat belt (VS20)

Component Description : SEAT BELT RR-SEAT LI NAFTA

Component Part Number : A 447 860 23 85

## Supplier Identification :

### Component Manufacturer

Name : Autoliv Inc

Address : Klarabergsviadukten 70

WORLD TRADE CTR Stockholm Foreign States 0028326

Country : Sweden

## Chronology :

On June 18, 2021, Mercedes-Benz AG was informed by Autoliv regarding the filed equipment report related to the seatbelt assembly's compliance with FMVSS/CMVSS 208, S7.1.1.5. and the potential supply of affected seat belts for Mercedes-Benz vehicles.

On June 25, 2021, MBAG decided to submit its own Noncompliance Information Report based on the determination of the supplier. At that time, the underlying MBAG internal analysis was still ongoing.

On July 29, 2021, MBAG decided that it will not submit a petition for inconsequential noncompliance related to this issue and instead will conduct a recall to remedy the non-compliance identified by Autoliv on vehicles in the field.

## Description of Remedy :

Description of Remedy Program : An authorized Mercedes-Benz dealer will check and replace, respectively, the seat belts on the affected vehicles if necessary. Pursuant to 49 C.F.R. § 577.11(e), Daimler Vans does not plan to provide notice about pre-notice reimbursement to owners since all involved vehicles are covered under the new vehicle warranty.

How Remedy Component Differs from Recalled Component : Sensor lever of child seat protection function according to specifications.  
Remedy parts number provided

Identify How/When Recall Condition was Corrected in Production : A change in the production procedure of our supplier ensures that this issue can no longer occur from July 06, 2021 onwards.

**Recall Schedule :**

Description of Recall Schedule : Owners will be notified approximately one week after the recall launches to dealers.

Planned Dealer Notification Date : SEP 20, 2021 - SEP 20, 2021

Planned Owner Notification Date : SEP 27, 2021 - SEP 27, 2021

\* NR - Not Reported