

PUBLIC

Mercedes-Benz Part 573 Submission

Original Submission to Portal November 1, 2023

Chronology-Only section

Chronology of Defect/Noncompliance Determination Supplement for ODI 22-00855-29976-10

In February 2020, MBAG after sales department was first made aware through internal analyses for quality assurance that the inspection gauge for checking the wear of the brake pads on the rear axle and the respective information in the owner's manual for using this inspection gauge may not have been provided with certain vehicles.

MBAG initiated a technical investigation, including the potential impact of not including the wear inspection gauge.

During the analysis process, MBAG investigated potential technical impacts of the described issue in connection with the conditions of the braking system. MBAG found that, due to the brake force distribution, the brake pads on the front axle wear out sooner than the rear axle brake pads. The potentially affected vehicles are equipped with an electronic wear sensor on the front axle. If the brake pads thickness falls below a certain level, the driver will be informed that the brake pads need to be replaced by the permanently lit warning lamp and warning message "Check brake pads. See Owner's Manual" in the instrument cluster. In this case, the brake performance would still not be impaired. Once the vehicle is taken to the workshop, the brake pads on the rear axle will also be checked and replaced, if necessary. In addition, internal vehicle test data was analyzed. This analysis showed that even with completely worn brake pads on the rear axle, the potentially affected vehicles would still meet the legal performance requirements for stopping distance in accordance with the FMVSS 135, S7.5.3. Furthermore, the force distribution of the brake system prohibits that the brake pads on the rear axle could reach the wear limit before the brake pads of the front axle reach their wear limit.

On August 7, 2020, MBAG determined that there was a technical noncompliance regarding FMVSS 135, S5.1.2. MBAG determined that this noncompliance was inconsequential with regard to motor vehicle safety, and submitted a petition for inconsequential noncompliance ("inconsequentiality petition") on September 4, 2020.

Some of the affected vehicles could have been resolved while still in access at the dealerships in advance of customer delivery.

On October 25, 2023, NHTSA published its denial of MBAG's petition for inconsequentiality in the Federal Register.

In accordance with that denial, MBAG determined on October 27, 2023 to conduct a recall.

MBAG confirms there are no warranty claims, field or service reports, and other information (such as the numbers of deaths and/or injuries) related to this defect in the USA.