

Chronology of Defect/Noncompliance Determination Supplement for ODI 24-00855-30354-10

In late 2021, IIHS conducted a rating of certain GLC (253 platform) vehicles, including their headlamp adjustments. The review of the rating results concluded that those headlamps might have been adjusted at an angle that exceeded MBAG's current production specification. The reported deviation was within the tolerance limits specified by FMVSS 108. Nonetheless, MBAG conducted plant actions to check headlamp adjustments on potentially affected vehicles and ensure headlamp adjustments were completed and consistent with current production specifications. Additionally at this time, MBAG readjusted the calibration process to avoid potential headlamp adjustment deviations in the production process. These process changes occurred in January 2022.

In July 2022, MBAG's vehicle audit process determined that headlamps in a GLC vehicle, built prior to the internal production adjustments, were set slightly above MBAG's internal production specifications (but still within FMVSS specifications). Based on that finding, MBAG initiated an investigation of the headlamp adjustments in GLC vehicles produced at two different plants.

MBAG conducted additional testing and analyses through the second half of 2022 until the beginning of 2023 to determine whether production lines from the two identified plants showed deviations in the headlamp adjustments. These analyses ultimately determined in mid-2023 that only vehicles with headlamps adjusted on two production lines from a single plant might not meet MBAG's current production specifications.

In the second half of 2023 and into January 2024, MBAG conducted further investigations to determine the cause of the incorrect adjustments and the extent to which the adjustment might potentially deviate from MBAG's production specifications. As part of that review, MBAG found that, in some instances, the headlamp angle adjustment could also slightly exceed the tolerance requirements of FMVSS 108. In parallel, MBAG reviewed field reports in late 2023 to determine if there had been any reported incidents involving the potentially affected vehicles. That review identified a single warranty claim in October 2021 pertaining to an incorrect headlamp adjustment.

On January 26, 2024, MBAG determined that a non-compliance with FMVSS 108 cannot be ruled out and decided to conduct a recall.

MBAG is aware of 1 warranty claim received on October 28, 2021, in the US.

MBAG is not aware of any reports of property damage, fatalities, crashes, or injury related to this FMVSS non-compliance.