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September 4, 2020

VIA OVERNIGHT MAIL
The Honorable James C. Owens
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
West Building, Room 41-304
Washington D.C. 20590

Re: Request for Inconsequential Noncompliance, Mercedes-Benz Recall No.: 20V-481

Dear Administrator Owens:

Mercedes-Benz AG ("MBAG") and Mercedes-Benz USA, LLC ("MBUSA") (collectively, "Mercedes-Benz"), submit this petition for inconsequential noncompliance pursuant to the Vehicle Safety Act, 49 U.S.C. § 30118(d) and 49 U.S.C. § 30120(h), and the related regulations at 49 C.F.R. 556. MBAG is a joint stock company headquartered in Germany, and MBUSA is a Delaware limited liability company with its principal place of business at One Mercedes-Benz Drive, Sandy Springs, Georgia 30328. Mercedes-Benz requests that the agency grant its petition exempting it from the notice and remedy requirements of the Vehicle Safety Act on the ground that the noncompliance described below is inconsequential to motor vehicle safety.

A total of 56,223 Model Year 2019-2021 Mercedes-Benz light-duty vehicles were not delivered with an inspection gauge tool that allows the user to check the wear status of the rear brake pads. As such, the vehicles do not have an independent means for the user to check the wear of the rear service brakes, per the requirements of Federal Motor Vehicle Safety Standard ("FMVSS") 135, S5.1.2. Despite the absence of this tool, there is no increased risk to motor vehicle safety due to the performance of the service brake system. Further, based on other information provided to the user about the status of the rear service brakes, even without the gauge tool, the operator is well informed about the remaning service life for the rear brake pads.

When the front brakes require service there is a visual warning to the driver, consistent with FMVSS 135, S5.1.2(a). For the front brakes, the brake wear indicator lamp automatically illuminates and will not extinguish until the brake pads are replaced. In addition, a warning message which states "Check Brake Pads. See Owner's Manual" automatically appears in the instrument cluster. This message will reappear at every ignition cycle. The indicator lamp and warning message inform the driver to have the brake pads inspected once the brake pad thickness reaches the requisite level.

From a technical perspective, the brake force distribution for the affected vehicles is designed so that the brake pads installed on the front wheels will always initially wear out faster than the brake pads used on the rear wheels. This means that the operator will receive the brake wear indicator and in-vehicle warning message described above well before the performance of the rear brake pads might ever become diminished.

When the vehicle is taken in for service, all Mercedes-Benz workshops are instructed to inspect and document the condition of all four sets of brake pads on both the front and the rear wheels. Each set of brake pads would then be replaced, if necessary. If the wear limit for the rear brake pads is reached, they will be replaced by the workshop. If there is a sufficient level of brake pad thickness remaining on the rear wheels such that they do not yet need to be replaced, the customer is informed of the condition of the rear brake pads and advised to monitor them prospectively. In the event that the rear brake pads are not replaced, based on the brake force distribution described below, the vehicle should have sufficient braking capability in both the front and rear brake systems to meet the stopping distance requirements of FMVSS 135 even if the vehicle is later driven to a point where the rear brake pads are completely worn out.

Background

FMVSS 135 includes a requirement that the condition of the vehicle brake lining be indicated to the driver. The purpose of the requirement is to inform the operator about excessive brake wear and thus ensure the safe braking performance of the vehicle, reducing the potential for a crash. The standard provides:

> S5.1.2. Wear status. The wear condition of all service brakes shall be indicated by either:
>
> (a) Acoustic or optical devices warning the driver at his or her driving position when lining replacement is necessary, or
>
> (b) A means of visually checking the degree of brake lining wear, from the outside or underside of the vehicle, utilizing only the tools or equipment normally supplied with the vehicle. The removal of wheels is permitted for this purpose.

On August 7, 2020, MBAG determined that a total of 56,223 Model Year 2019 – 2021 Mercedes-Benz vehicles did not receive a gauge tool that would measure the thickness of the rear brake pads. Because the rear service brakes of the vehicle did not otherwise have a separate acoustic or optical device to communicate brake wear status, MBAG submitted a

Noncompliance Information Report to NHTSA on August 14, 2020. *See* NHTSA Recall 20V-481 (attached).

Analysis

Manufacturers may be exempted from the notification and remedy provisions of the Safety Act if NHTSA determines that the noncompliance is inconsequential to motor vehicle safety. *See* 49 U.S.C. §§ 30118(d), 30120(h). The basis upon which NHTSA evaluates an inconsequentiality petition is "whether the occupant who is affected by the noncompliance is likely to be exposed to a significantly greater risk than an occupant in a compliant vehicle." *See* 69 Fed. Reg. 19897, 19900 (April 14, 2004). This matter is appropriate for a decision that the noncompliance is inconsequential to motor vehicle safety as it does not present any increased risk to vehicle occupants.

Under FMVSS 135, S5.1.2, the status of the wear of all of the vehicle's service brakes is to be provided through either: (1) a visual or acoustical indicator that is apparent from the driver's seating position when brake lining replacement is necessary or, (2) a visual inspection from the outside of the vehicle using only the tools or equipment normally provided with the vehicle.

In the affected vehicles, the front service brakes use an electrical brake pad sensor to monitor the thickness of the front brake pads. Once the front brakes reach a thickness of 1/8 inch or 3 mm[1] a warning lamp will automatically display in the instrument cluster and will remain permanently illuminated until the vehicle is serviced. In addition, the driver will receive an in-vehicle warning message that states "Check Brake Pads. See Operator's Manual." The indicator and message below appear in the instrument cluster and communicate the brake pad wear status to the driver.

Check brake pads See Owner's Manual

The brake warning indicator and in-vehicle message will display at each ignition cycle until the brake pads are replaced. The warning lamp cannot be extinguished unless new brake pads are installed. While the driver could manually extinguish the warning message, it will automatically reappear at each ignition cycle.[2]

[1] For perspective, new front brake pads are a thickness of approximately 1/2 inch or 12 mm.

[2] The in-vehicle warning message displays well before the front brake pads actually require being replaced. Under typical driving conditions, the driver could operate the vehicle for an additional 6,000 miles before front brake pad wear becomes critical.

Depending on the vehicle platform, the brake force distribution is in a range of 71.9% - 75.5% (front)/ 28.1% – 24.5% (rear). This means that between nearly 72% to more than 75% of the vehicle's braking force is generated by the front brake pads. Because of the brake force distribution, the front brake pads will always initially wear out faster than the brake pads on the rear wheels. Indeed, the front brake pads will then continue to wear out at a faster pace than the rear brake pads, approximately 1 ½ to 2 times more frequently depending on the operator's driving style.

Once the front brake pads reach a thickness of approximately 3 mm, both the warning lamp and the warning message are automatically triggered and the consumer is advised to visit the workshop to have the front brake pads replaced. Any time one set of brake pads is inspected at a Mercedes-Benz workshop, the standard work instructions direct the technician to also inspect and evaluate the status of all other sets of brake pads. (This inspection is carried out visually with the tire and wheel on the vehicle. In exceptional circumstances, the the technician may need to remove the wheel to conduct the inspection and measurement. The technician does not use the gauge tool discussed in this petition in either scenario). The workshop instructions provide that the technician is to assess the remaining braking distance for each axle based on the thickness of the brake pad that is most heavily worn. If the remaining thickness of the brake pads is not sufficient to make it to the next service interval, the customer will be advised to replace the brake pads. However, if the wear limit has already been reached, the technician will automatically replace the brake pads. Thus, at every Mercedes-Benz workshop visit, all four sets of brake pads will be inspected for wear. The customer will be advised of the remaining thickness and individual brake pads are replaced automaticallly if needed. Because the front brakes wear faster than the rear due to the brake force distribution, the vehicle's rear brakes will be inspected by a trained professional technician a number of times before they ever need to be replaced.

Even if the vehicle were taken to an independent repair facility that did not follow Mercedes-Benz's comprehensive brake pad inspection protocols, there is not an increased safety risk due to the vehicle being operated with worn rear brake pads. In the worst case, if a vehicle with fully worn brake pads on the rear axle continued to operate, given the brake force distribution and the performance of the rear brakes, the vehicle would continue to meet the braking distance requirements of FMVSS 135. Furthermore, the brakes on the rear axle will continue to operate, even with completely worn brake pads, although with slightly reduced braking performance that is anticipated to slightly increase the stopping distance. With completely worn rear brake pads, the driver will hear the unmistakeable sound of metal being pressed against the brake discs. Moreover, the ABS and ESC functionality is not affected by worn rear brake pads and will continue to function normally, as needed.

Mercedes-Benz is not aware of any reports or complaints about the issue from the field and it has corrected the condition in production. Based on the above information, Mercedes-Benz requests that that the agency exempt it from the notification and remedy provisions under the Safety Act.

Sincerely,

Jacqueline Glassman
Partner

JG:cli

Enclosure

safercar.gov

Mercedes-Benz USA, LLC.

Vehicle Report

NHTSA ID: 20V481 Transaction ID: 20-00855-24917-10 (Original Report)

Required fields indicated with *

Manufacturer: Mercedes-Benz USA, LLC.

13470 International Parkway
Jacksonville FL 32218

Bibi Analil
741-9608,

This is a Noncompliance Report. Filing a petition pursuant to 49 CFR 556

Vehicle Information

Mercedes-Benz A220 2019 - 2020

* **Model Yr. Start:** 2019 * **Model Yr. End:** 2020
* **Make:** Mercedes-Benz
* **Model:** A220

Production Dates Begin: 10/08/2018
End: 07/27/2020

VIN Range(s): Begin: End:

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
Model Year 2019-2020 A220 27627 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

Mercedes-Benz A35 AMG 2020

* **Model Yr. Start:** 2020 * **Model Yr. End:** 2020
* **Make:** Mercedes-Benz
* **Model:** A35 AMG

Production Dates Begin: 10/08/2018
End: 07/27/2020

VIN Range(s): Begin: End:

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
Model Year 2020 A35 AMG 417 Vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

Mercedes-Benz CLA250 2020 - 2021

* **Model Yr. Start:** 2020 * **Model Yr. End:** 2021
* **Make:** Mercedes-Benz
* **Model:** CLA250

Production Dates Begin: 10/08/2018
End: 07/27/2020

VIN Range(s): Begin: End:

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
Model Year 2020-2021 CLA250 11382 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

Mercedes-Benz CLA35 AMG 2020

* **Model Yr. Start:** 2020 * **Model Yr. End:** 2020
* **Make:** Mercedes-Benz
* **Model:** CLA35 AMG

Production Dates Begin: 10/08/2018
End: 07/27/2020

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
Model Year 2020 CLA35 AMG 911 vehicles. The recall population was determined through production records. Vehicles outside of the recall

NHTSA-200910-003

population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

VIN Range(s): Begin: End:

Mercedes-Benz CLA45 AMG 2020

* **Model Yr. Start:** 2020
* **Model Yr. End:** 2020
* **Make:** Mercedes-Benz
* **Model:** CLA45 AMG

Production Dates Begin: 10/08/2018
End: 07/27/2020

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
Model Year 2020 CLA45 AMG 394 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

VIN Range(s): Begin: End:

Mercedes-Benz GLA250 2021

* **Model Yr. Start:** 2021
* **Model Yr. End:** 2021
* **Make:** Mercedes-Benz
* **Model:** GLA250

Production Dates Begin: 10/08/2018
End: 07/27/2020

Type: LIGHT VEHICLES
Body Style: SUV
Powertrain: GAS

Descriptive Information:
Model Year 2021 GLA250 2457 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

VIN Range(s): Begin: End:

Mercedes-Benz GLA35 AMG 2021

* **Model Yr. Start:** 2021
* **Model Yr. End:** 2021
* **Make:** Mercedes-Benz
* **Model:** GLA35 AMG

Production Dates Begin: 10/08/2018
End: 07/27/2020

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
Model Year 2021 GLA35 AMG 4 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

VIN Range(s): Begin: End:

Mercedes-Benz GLA45 AMG 2021

* **Model Yr. Start:** 2021
* **Model Yr. End:** 2021
* **Make:** Mercedes-Benz
* **Model:** GLA45 AMG

Production Dates Begin: 10/08/2018
End: 07/27/2020

Type: LIGHT VEHICLES
Body Style: 4-DOOR
Powertrain: GAS

Descriptive Information:
Model Year 2021 GLA45 AMG 3 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

VIN Range(s): Begin: End:

Mercedes-Benz GLB250 2020

* **Model Yr. Start:** 2020
* **Model Yr. End:** 2020
* **Make:** Mercedes-Benz
* **Model:** GLB250

Production Dates Begin: 10/08/2018

Type: LIGHT VEHICLES
Body Style: SUV
Powertrain: GAS

Descriptive Information:

End: 07/27/2020

Model Year 2020 GLB250 13028 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.

VIN Range(s): Begin: End:

Number potentially involved: 56223 **Estimated percentage of involved with defect:** 100%

Defect / Noncompliance Description

For this Defect/Noncompliance:

*** Describe the defect or noncompliance:**
Mercedes-Benz AG ("MBAG"), the manufacturer of Mercedes-Benz vehicles, has determined that certain Model Year ("MY") 2019-2021 A-Class (177 platform), CLA-Class (118 platform), GLA-Class (247 platform), and GLB-Class (247 platform) vehicles might not be equipped with an inspection gauge to check the wear of the brake pads on the rear axle. Furthermore, the respective information for using this inspection gauge might not be included in the owner's manual.

If a noncompliance, provide the applicable FMVSS:
135 - Light vehicle brake systems

If applicable, provide any further FMVSS affected:

Describe the cause:
Due to a documentation error in the production control system, the potentially affected vehicles might not be equipped with for a means for checking the wear of the rear brake pads and the respective information in the owner's manual might be missing.

*** Describe the safety risk:**
There is no safety impact as a result of this issue: Due to the brake force distribution, the brake pads on the front axle will always 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 decreases below a certain level on the front axle the driver will be informed by both the permanently lit warning lamp and the warning message with the text "Check brake pads. See Owner's Manual" in the instrument cluster that the brake pads need to be replaced. This warning message will appear at the beginning of each driving cycle until new brake pads are installed. The above mentioned permanently lit warning lamp cannot be turned off by the driver and is only deactivated after the brake pads have been replaced. Even if the brake pads on the front axle fall below the threshold level, the brake pads on the rear axle continue to have sufficient thickness. Once the vehicle is taken to the workshop, the brake pads on the rear axle will also be inspected and replaced, if necessary. Due to the force distribution of the brake system, it can be ruled out that the brake pads on the front axle reach the wear limit before the brake pads of the rear axle reach their wear limit. In addition, internal vehicle tests have shown that even with completely worn brake pads on the rear axle, the potentially affected vehicles will still meet the legal performance requirements for stopping distance in accordance with the FMVSS 135, S7.5.3. The electronic driving safety systems (ABS, ESP, etc.) would continue to function as intended in this case. As the condition does not pose a safety risk, MBAG intends to submit a petition for inconsequental noncompliance.

Identify any warning which can precede or occur:
The customer will not receive an advance warning due to the nature of the failure mechanism.

This Recall only affects vehicles in certain geographic regions (e.g. only salt states).

If applicable, identify the manufacturer of the defective or noncompliant component. If the manufacturer of the component is unknown, provide the information for the company that supplied the subject component.

Component manufacturer

Company Information

Company Name:
Country:
Address 1:
Address 2:
City:
State:
Zip/Postal Code:

Company Contact Information

First Name:
Last Name:
Position:
Email:
Phone:

Involved Components

If the defect or noncompliance involves a specific component(s), identify that component(s) below.

Component Name:	GAUGE - BRAKE LINING WEAR
Component Description:	GAUGE
Component Part Number:	A0005830642
Component Name:	SUPPLEMENTARY BOOKLET
Component Description:	BOOKLET
Component Part Number:	A1185846304

Chronology of Defect / Noncompliance Determination

NHTSA-200910-003

Provide the chronology of events leading up to the defect decision or test data for the noncompliance decision.:
In February 2020, MBAG's 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 gauge. In the course of 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 by both the permanently lit warning lamp and the warning message with the text "Check brake pads. See Owner's Manual" in the instrument cluster that the brake pads need to be replaced. In this case, the brake performance would still not be impaired. In the course of this measure, 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. Please see Chronology supplement.

Identify the Remedy

Describe the defect/noncompliance remedy program, including the manufacturer's plan for reimbursement.
MBAG is submitting a petition for inconsequential noncompliance.

Describe what distinguishes the remedy component from the recalled component.

Identify and describe how and when the recall condition was corrected in production.
A change in the documentation of the production control system ensures that this issue can no longer occur from July 28, 2020 onwards.

Identify the Recall Schedule

Describe the recall schedule for notifications.:
Dealers will be notified of the pending voluntary recall campaign on August 21, 2020. Owners will be notified of the voluntary recall campaign approximately one week after launch to the dealers on October 13, 2020. A copy of all communications will be provided when available.

Planned Dealer Notification Begin Date: 08/21/2020
Planned Dealer Notification End Date:
Planned Owner Notification Begin Date: 10/13/2020
Planned Owner Notification End Date:

Manufacturer's identification code for this recall (if applicable):

Please be reminded that owner notification letters must be mailed no more than 60 days from submission of this report.

Manufacturer Comments to NHTSA Staff

For any questions, please contact Gregory Gunther at gregory.gunther@mbusa.com

Document Upload

There are 2 documents associated with this report.

Part 573 Safety Recall Report 20V-481

Manufacturer Name : Mercedes-Benz USA, LLC.
Submission Date : AUG 14, 2020
NHTSA Recall No. : 20V-481
Manufacturer Recall No. : NR

NHTSA
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION

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 : 56,223
Estimated percentage with defect : 100 %

Vehicle Information :

Vehicle 1 : 2020-2020 Mercedes-Benz A35 AMG
Vehicle Type : LIGHT VEHICLES
Body Style : 4-DOOR
Power Train : GAS
Descriptive Information : Model Year 2020 A35 AMG 417 Vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates : OCT 08, 2018 - JUL 27, 2020
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Vehicle 2 : 2020-2020 Mercedes-Benz CLA45 AMG
Vehicle Type : LIGHT VEHICLES
Body Style : 4-DOOR
Power Train : GAS
Descriptive Information : Model Year 2020 CLA45 AMG 394 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates : OCT 08, 2018 - JUL 27, 2020
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Vehicle 3 : 2021-2021 Mercedes-Benz GLA250
Vehicle Type : LIGHT VEHICLES
Body Style : SUV
Power Train : GAS
Descriptive Information : Model Year 2021 GLA250 2457 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates : OCT 08, 2018 - JUL 27, 2020
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Vehicle 4 : 2019-2020 Mercedes-Benz A220
Vehicle Type : LIGHT VEHICLES
Body Style : 4-DOOR
Power Train : GAS
Descriptive Information : Model Year 2019-2020 A220 27627 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates : OCT 08, 2018 - JUL 27, 2020
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Vehicle 5 : 2020-2021 Mercedes-Benz CLA250
Vehicle Type : LIGHT VEHICLES
Body Style : 4-DOOR
Power Train : GAS
Descriptive Information : Model Year 2020-2021 CLA250 11382 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates : OCT 08, 2018 - JUL 27, 2020
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Vehicle 6 : 2020-2020 Mercedes-Benz CLA35 AMG
Vehicle Type : LIGHT VEHICLES
Body Style : 4-DOOR
Power Train : GAS
Descriptive Information : Model Year 2020 CLA35 AMG 911 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates : OCT 08, 2018 - JUL 27, 2020
VIN Range 1 : Begin : NR End : NR ☐ Not sequential

Vehicle 7 :	2021-2021 Mercedes-Benz GLA45 AMG
Vehicle Type :	LIGHT VEHICLES
Body Style :	4-DOOR
Power Train :	GAS
Descriptive Information :	Model Year 2021 GLA45 AMG 3 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates :	OCT 08, 2018 - JUL 27, 2020
VIN Range 1 :	Begin : NR End : NR ☐ Not sequential

Vehicle 8 :	2021-2021 Mercedes-Benz GLA35 AMG
Vehicle Type :	LIGHT VEHICLES
Body Style :	4-DOOR
Power Train :	GAS
Descriptive Information :	Model Year 2021 GLA35 AMG 4 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates :	OCT 08, 2018 - JUL 27, 2020
VIN Range 1 :	Begin : NR End : NR ☐ Not sequential

Vehicle 9 :	2020-2020 Mercedes-Benz GLB250
Vehicle Type :	LIGHT VEHICLES
Body Style :	SUV
Power Train :	GAS
Descriptive Information :	Model Year 2020 GLB250 13028 vehicles. The recall population was determined through production records. Vehicles outside of the recall population are equipped with a brake inspection gauge and supplementary booklet with the owners manual.
Production Dates :	OCT 08, 2018 - JUL 27, 2020
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 vehicles, has determined that certain Model Year (“MY”) 2019-2021 A-Class (177 platform), CLA-Class (118 platform), GLA-Class (247 platform), and GLB-Class (247 platform) vehicles might not be equipped with an inspection gauge to check the wear of the brake pads on the rear axle. Furthermore, the respective information for using this inspection gauge might not be included in the owner's manual.
FMVSS 1 :	135 - Light vehicle brake systems
FMVSS 2 :	NR
Description of the Safety Risk :	There is no safety impact as a result of this issue:

Description of the Safety Risk :	Due to the brake force distribution, the brake pads on the front axle will always 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 decreases below a certain level on the front axle the driver will be informed by both the permanently lit warning lamp and the warning message with the text "Check brake pads. See Owner's Manual" in the instrument cluster that the brake pads need to be replaced. This warning message will appear at the beginning of each driving cycle until new brake pads are installed. The above mentioned permanently lit warning lamp cannot be turned off by the driver and is only deactivated after the brake pads have been replaced. Even if the brake pads on the front axle fall below the threshold level, the brake pads on the rear axle continue to have sufficient thickness. Once the vehicle is taken to the workshop, the brake pads on the rear axle will also be inspected and replaced, if necessary. Due to the force distribution of the brake system, it can be ruled out that the brake pads on the front axle reach the wear limit before the brake pads of the rear axle reach their wear limit. In addition, internal vehicle tests have shown that even with completely worn brake pads on the rear axle, the potentially affected vehicles will still meet the legal performance requirements for stopping distance in accordance with the FMVSS 135, S7.5.3. The electronic driving safety systems (ABS, ESP, etc.) would continue to function as intended in this case. As the condition does not pose a safety risk, MBAG intends to submit a petition for inconsequental noncompliance.
Description of the Cause :	Due to a documentation error in the production control system, the potentially affected vehicles might not be equipped with for a means for checking the wear of the rear brake pads and the respective information in the owner's manual might be missing.
Identification of Any Warning that can Occur :	The customer will not receive an advance warning due to the nature of the failure mechanism.

Involved Components :

Component Name 1 :	GAUGE - BRAKE LINING WEAR
Component Description :	GAUGE
Component Part Number :	A0005830642

Component Name 2 :	SUPPLEMENTARY BOOKLET
Component Description :	BOOKLET
Component Part Number :	A1185846304

Supplier Identification :

Component Manufacturer

Name :	NR
Address :	NR
	NR
Country :	NR

Chronology :

In February 2020, MBAG's 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 gauge. In the course of 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 by both the permanently lit warning lamp and the warning message with the text "Check brake pads. See Owner's Manual" in the instrument cluster that the brake pads need to be replaced. In this case, the brake performance would still not be impaired. In the course of this measure, 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.

Please see Chronology supplement.

Description of Remedy :

Description of Remedy Program :	MBAG is submitting a petition for inconsequential noncompliance.
How Remedy Component Differs from Recalled Component :	NR
Identify How/When Recall Condition was Corrected in Production :	A change in the documentation of the production control system ensures that this issue can no longer occur from July 28, 2020 onwards.

Recall Schedule :

Description of Recall Schedule :	Dealers will be notified of the pending voluntary recall campaign on August 21, 2020. Owners will be notified of the voluntary recall campaign approximately one week

	after launch to the dealers on October 13, 2020. A copy of all communications will be provided when available.
Planned Dealer Notification Date :	AUG 21, 2020 - NR
Planned Owner Notification Date :	OCT 13, 2020 - NR

* NR - Not Reported