

# INSURANCE INSTITUTE FOR HIGHWAY SAFETY

February 8, 2007

The Honorable Nicole R. Nason  
Administrator  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W  
Washington, D.C. 20590

**Letter of Support for Petitions for Reconsideration Submitted by the  
Alliance of Automobile Manufacturers and First Technology Safety Systems  
49 CFR 572 Subpart V; SID-IIs Side Impact Test Dummy, 5th Percentile Adult Female  
Docket No. NHTSA-25442**

Dear Ms. Nason:

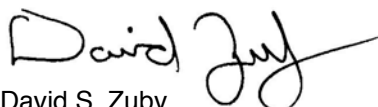
The Insurance Institute for Highway Safety (IIHS) supports the petitions submitted by the Alliance of Automobile Manufacturers and First Technology Safety Systems (FTSS) to the National Highway Traffic Safety Administration (NHTSA) concerning reconsideration of the SID-IIs final rule (December 14, 2006). The most important aspect of the petitions is the request to change the specification for the SID-IIs iliac wing to the updated design supported by the Occupant Safety Research Partnership SID-IIs Upgrade Task Group, FTSS, and IIHS.

The updated iliac wing includes a material change to improve repeatability and durability, and integral metal standoffs to prevent interference with measurements from the iliac load cell that occurs over time due to compression of the softer material at the interface of the original design. IIHS recently converted all the SID-IIs dummies (Build Level C) used in our consumer information side impact test program to include the updated design. As IIHS moves forward in side impact testing, it is important to harmonize the dummies used in our tests with the SID-IIs dummies (Build Level D) used in NHTSA's tests, which would need to be updated to incorporate the new iliac wing. Adoption of the new iliac wing is critical to avoid differences in test results between organizations using the improved iliac wing design and those using the design currently set by NHTSA. Using two different iliac wing designs also would result in additional cost to laboratories around the world that conduct both NHTSA-compliance and IIHS consumer information crash tests.

IIHS also supports the request for NHTSA to consider data from multiple laboratories when establishing performance criteria for dummy verification tests. This is necessary to account for normal variability among laboratories.

IIHS encourages NHTSA to grant the pending petitions for reconsideration. We will be glad to assist the agency in responding to these petitions by providing data from our side impact tests using the improved iliac wing design.

Sincerely,



David S. Zubey  
Senior Vice President, Vehicle Research

cc: Docket Clerk, Docket No. NHTSA-25442