

HIGHWAY LOSS DATA INSTITUTE

June 12, 2008

The Honorable Nicole R. Nason
 Administrator
 National Highway Traffic Safety Administration
 1200 New Jersey Avenue, SE, West Building
 Washington, DC 20590

Petition for Reconsideration of Amendments to 49 CFR Part 565, Vehicle Identification Number Requirements; Docket No. NHTSA-2008-0022

Dear Administrator Nason:

On April 30, 2008, the National Highway Traffic Safety Administration (NHTSA) published amendments to 49 CFR Part 565, Vehicle Identification Number (VIN) Requirements that establish new requirements for the 17 positions of VINs for passenger cars, multipurpose passenger vehicles (MPVs), and trucks with gross vehicle weight ratings (GVWRs) of 10,000 pounds (4,536 kg) or less. The new standard requires that VIN position 7 now be alphabetic to indicate that the model years of the vehicle types specified above fall between 2010 and 2039. Prior to this change, position 7 had to be numeric. The purpose is to ensure that the VIN system continues to uniquely identify the most popular passenger vehicles for at least another 30 years.

Unfortunately, two important vehicle groups were excluded: motorcycles and some pickup trucks with GVWRs greater than 10,000 pounds. Motorcycles have become increasingly popular among American consumers. Without unique identifiers for new models, it will not be possible to track their on-road experience and safety, and it will be difficult for insurers to identify particular motorcycles and correctly identify their actuarial risk. The lack of unique identifiers for large pickups is not as problematic. However, it will complicate VIN processing for some pickups with GVWRs of 10,000 pounds or less because decoders will not be able to discern whether the VINs for these vehicle types are structured to comply with the old or new requirements.

Motorcycles

The Highway Loss Data Institute (HLDI) analyzed more than 4 million motorcycle VINs in its database. Analysis showed that all allowable alphabetic and numeric characters have been used in every VIN position except position 9. HLDI requests that NHTSA adopt one of the following two options to ensure unique VINs for motorcycles.

The first option is to use an alternative set of characters in VIN position 9 for model years 2010-39. This would allow motorcycle manufacturers to continue to populate VIN positions 1-8 for model years 2010-39 in the same manner as for model years 1980-2009 while guaranteeing unique VINs for model years 1980-2039. Changes to 49 CFR Part 565 will require amending Part 565.15 Table V to include a motorcycle check digit, as shown on the fourth line in the table below.

49 CFR Part 565.15 Content requirements; Table V – Ninth position check digit values

Fractional remainder	0	1/11	2/11	3/11	4/11	5/11	6/11	7/11	8/11	9/11	10/11
Decimal equivalent remainder	0	0.091	0.182	0.273	0.364	0.455	0.545	0.634	0.727	0.818	0.909
Check digit	0	1	2	3	4	5	6	7	8	9	X
Motorcycle check digit 2010-39	A	B	C	D	E	F	G	H	J	K	L

The second option is to use one of the alphabetic characters not identified in Part 565.13 (g) — I, O, or Q — in VIN positions 4-8 to indicate model years 2010-39. HLDI recognizes that these alphabetic characters are similar in appearance to other characters currently in use, but we believe they are no more subject to transcription confusion than several other allowable characters. For example, HLDI routinely finds instances where the number 5 and letter Z are confused as well as 8 and B, 0 and D, and 6 and G.

Trucks

The 10,000-pound GVWR boundary is problematic for some trucks. GVWRs of pickups have increased in recent years, and Dodge, Ford, and General Motors all sell pickup series with GVWRs both above and below the 10,000-pound threshold. Thus some pickups of a given make/series (e.g., Ford F-350) will be required to use alphabetic characters in VIN position 7, whereas others of the same make/series will not. HLDI analyzed more than 305 million VINs in its database to determine the distribution of 2007 model year vehicle make/series whose GVWRs are both above and below the 10,000-pound threshold. Four pickup truck make/series met this criteria (see table below), representing more than 50,000 VINs.

**Distribution of GVWRs for 2007 model year vehicle series
with GVWRs above and below 10,000-pound boundary**

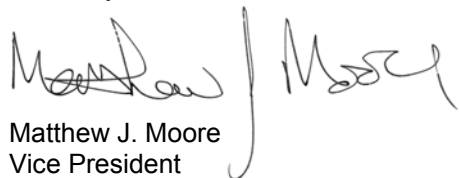
Vehicle series	Percent of vehicles with GVWRs ≤10,000 pounds	Percent of vehicles with GVWRs >10,000 pounds
Ford F-350	0.3	99.7
Chevrolet Silverado 3500	25.5	74.5
GMC Sierra 3500	27.4	72.6
Dodge Ram 3500	8.5	91.5
Total	10.1	89.9

Under the revisions to 49 CFR 565, 25.5 percent of Chevrolet Silverado 3500 pickups would be required to use alphabetic characters in VIN position 7 to identify them as being model years 2010-39. The other 74.5 percent with GVWRs greater than 10,000 pounds would not be required to do so.

In total, almost 90 percent of the pickups in these make/series had GVWRs greater than 10,000 pounds. Analysis of the VINs for these pickups indicated the VINs did not contain alphabetic characters in position 7. HLDI requests NHTSA to require that manufacturers of any make/series with GVWRs both above and below the 10,000-pound threshold follow the new rules for all vehicles of that make/series — that is, to use alphabetic characters in VIN position 7 to indicate model years 2010-39 and ensure the uniqueness of VINs for this group of vehicles.

If you have any questions about the issues identified or our proposed solutions, please feel free to contact me at 703-247-1633.

Sincerely,



Matthew J. Moore
Vice President