

DOT's Restraint Case: Final Arguments

Secretary of Transportation William Coleman, Jr. has now received final arguments from all sides on how best to provide improved crash protection for automobile occupants. He has promised that before the end of the year he will decide if passive – that is, automatic – restraints will be required for improved frontal crash protection in future cars.

Following his August 3 hearing on the matter (see *Status Report*, Vol. 11, No. 13, Aug. 17, 1976), Coleman announced that he would leave the docket on this question opened until September 17 to receive further comments and clarifications.

This entire issue of *Status Report* is devoted to reporting on some of the more than 7,000 submissions that were received by the Secretary between the hearing and September 17.

The submissions generally were structured around the five alternatives proposed by Coleman:

I. *Continue the Present Requirement:* Under this alternative the present standard (FMVSS 208) would be continued for three years while research on passive restraints continued. The current standard allows auto makers to use one of three occupant restraint methods – completely passive restraints, frontal passive restraints combined with lap belts, and fully active restraints, that is, active belts only. Passive belt system are also permitted under the standard.

II. *Safety Belt Use Laws:* Under this option the current standard would be extended and Congress would be asked to enact a law which would empower the Department of Transportation to pressure the states to enact safety belt use laws.

III. *Federal Field Test of Passive Restraints:* This alternative calls for the current standard to be retained and for Congress to provide \$50 - \$150 million to DOT for a field test of passive restraint devices.

IV. *A Passive Restraint Standard:* Coleman has cited the air bag and the Volkswagen passive belt system as two examples of passive restraint systems. Coleman's announced proposal, however, only calls for passive restraints for the driver side of the car starting with 1980 models and either passive restraints or active (that is, non-automatic) belts for the other front seat passengers. Standard-equipment passive restraints for all front seat occupants would not be required for at least two years thereafter.

V. *Mandatory Passive Restraint Option:* Under this plan the current standard would be amended to require auto makers to equip at least one model in each automobile class with passive restraints.

In Compared Frontal Crashes

Bags Better Than Belts, Study Finds

More lives could be saved and greater reductions in injury severity achieved in frontal crashes by having standard-equipment front-seat air bags in all cars than by even 100 percent safety belt use, a new comparison of restraint system effectiveness has found.

The comparison was carried out by the Insurance Institute for Highway Safety and, in a detailed report, transmitted to Secretary of Transportation William Coleman, Jr. The report contains a scientific study of three groups of real-world frontal crashes:

- those in which front-seat occupants were using *no restraints*;
- those in which they were wearing *lap/shoulder belts*;
- those in which they were *automatically restrained by air bags*.

The study found that both air bags and lap/shoulder belts substantially reduced the likelihood of death and serious injury to front seat occupants of full-size and luxury cars involved in the compared frontal crashes. In the more severe crashes, however, the air bags gave better protection than lap/shoulder belts.

COMPARISON DATA: IIHS used data from three basic sources to prepare its comparison of restraint system effectiveness: National Highway Traffic Safety Administration's multidisciplinary accident investigation (MDAI) team reports on crashes of air bag equipped vehicles, the University of Michigan Highway Safety Research Institute's file of MDAI reports on crashes involving lap and shoulder belt restrained occupants and NHTSA's restraint effectiveness file on lap/shoulder belted and unrestrained occupants involved in crashes.

Only data on full-size and luxury cars involved in crashes were used, since virtually all of the present on-the-road air bag equipped vehicles fall into these two vehicle classes. The study noted that since vehicle

Lives Saved By Bags, Belts Not Entirely Same Lives

The crash injury deaths that would be prevented by adopting Alternative IV are *not* entirely the same deaths that would be prevented by adopting Alternative II – even if sufficient belt use could be achieved under Alternative II. In other words, accomplishing either Alternative *alone* would allow some people to be fatally or seriously injured who would not die or be seriously injured if the other Alternative were accomplished. This is because air bag passive crash protection, even to the level required by the present 208 option, is better than that provided by belts in *frontal* crashes (the source of the majority of occupant deaths), and vice versa for belts in other crash modes. For these reasons, Alternative IV should be adopted, augmented by efforts to substantially increase supplemental *lap* belt use

From the Insurance Institute for Highway Safety
Transmittal to Secretary Coleman

Estimates Of Maximum Belt Use

Current estimates of about 30 percent belt use are based on observations of drivers in later model cars in urban areas. The evidence strongly suggests that this low percentage is about the maximum likely to be achieved in the U.S., since:

- Belt use tends to decline as cars get older.
- Passengers are less likely to use belts than drivers, and children far less so.
- Belt use in small cities has been found to be considerably less than in metropolitan areas.

From the Insurance Institute for Highway Safety
Transmittal to Secretary Coleman
(References omitted.)

size “is an important determinant of the likelihood of injury once a crash has occurred, it would have been inappropriate to compare restraint performance among vehicles of substantially different size.”

In addition, only frontal and front angle crashes were studied since “these are the principal crash modes in which the air bag restraint system is designed to protect occupants” and because such crashes are “the source of the majority of occupant deaths.” For the comparison, the crashes were grouped by severity using a collision classification system developed by the Society of Automotive Engineers.

Only data for front seat occupants were analyzed because present air bag systems are only used for those occupants. Infant occupants of two years or younger were also not included in the comparison because “neither production lap/shoulder belts nor present air bag systems are designed to provide adequate impact protection for infants,” according to the study. The overall severity of the occupants’ injuries were assessed by use of the Injury Severity Score, which classifies injuries based on both the severity and number of the injuries. The ISS has been shown to be strongly related to likelihood of death, length of hospitalization and extent of disability. (See *Status Report*, Vol. 9, No. 7, April 9, 1974.)

INJURIES REDUCED: In the less severe crashes studied, the average injuries to occupants, regardless of restraint, were “very minor, for example, aches, stiffness, bruises, scrapes, superficial cuts and sprains of the hand or finger.” But, as the severity of the crashes increased, the average severity of the injuries to the unrestrained occupants “increased dramatically.” For air bag protected occupants in severe frontal crashes, however, the average injury severities were reduced by 66 percent, as compared to 55 percent for the lap/shoulder belted occupants. The reduction in likelihood of death in such crashes was 79 percent for air bag protected occupants and 72 percent for lap/shoulder belted occupants.

These injury comparisons “tend to confirm the laboratory testing results, indicating that air bags can offer better protection in frontal crashes than lap/shoulder belts when worn and substantially improved protection over no restraint,” the study concluded.

The study, *Air Bags and Lap/Shoulder Belts – A Comparison of Their Effectiveness in Real World, Frontal Crashes*, by Dinesh Mohan, Paul Zador, Brian O’Neill and Marvin Ginsburg can be obtained by writing to: “Bag-Belt Comparison,” Insurance Institute for Highway Safety, Watergate Six Hundred, Washington, D.C. 20037.

Public Acceptance: Passive Restraints

DOT ADVISORY GROUP: The Department of Transportation's Citizen's Advisory Committee on Transportation Quality, a presidentially appointed 21-member advisory panel, was called to Washington by Secretary Coleman to consider his five proposals. Following a two day briefing by John Snow, NHTSA administrator, the panel voted on the alternatives.

By a vote of 10-6 the committee recommended to Coleman that he mandate passive restraints for all new cars.

The proposal calling for continuation of the present standard was rejected by a vote of 10-6, and the other three proposals were unanimously turned down.

FOUR GOVERNORS ENDORSE PASSIVE RESTRAINTS: Although state officials soundly rejected the concept of mandatory belt use laws (see page 6), there was support for improved automatic protection in all cars.

Governor George Ariyoshi of Hawaii said, "Requiring vehicle manufacturers to provide occupant restraint protection which requires no additional action on the part of the occupant, even though more costly and lacking immediate benefit will, in the future, become less expensive and provide vehicle occupant protection to the maximum number of persons."

Wisconsin's Governor, Patrick Lucey, recommended to Coleman that "the safety and effectiveness of passive restraint systems, not their added cost to motor vehicle manufacturers, be the determining factor in your considerations."

MVMA Poll: Air Bags 'Least Objectionable'

The Motor Vehicle Manufacturers Association (MVMA) submitted to Secretary Coleman a public opinion survey of licensed drivers conducted during May and June. In it, respondents were asked to rate three alternative "courses of action toward safer driving:" a mandatory seat belt usage law, mandatory air bags, and nonpayment of automobile insurance for not wearing a seat belt.

Among respondents who said they knew what an air bag was, air bags were the least objectionable alternative. Only 41 percent would "certainly vote no" on a "mandatory air bag law," compared to 49 percent who would "certainly" vote against mandatory belt use and 66 percent against nonpayment of insurance.

A recent Insurance Institute for Highway Safety survey of drivers intending to buy new cars, described passive protection by *function* rather than identifying it as a specific mechanism such as an air bag. It found that nearly 80 percent of those interviewed prefer crash protection that requires no activation by drivers and passengers each time they travel, whether alone or in combination with some kind of active protection. (See *Status Report*, Vol. 11, No. 13, Aug. 17, 1976.)

In the MVMA poll, 50 percent of those interviewed agreed with the statement that "driving should be made more safe than it is today by building more safety devices into cars which cannot be ignored, turned off or removed."

Wendell Anderson, Governor of Minnesota, said, "We feel that the ultimate in vehicle occupant protection is an effective, reliable, and relatively inexpensive passive restraint system, with lap belts provided as supplementary protection against side intrusion, roll-over, rear end and multiple impact crash situations."

Governor James Longely of Maine told Coleman, "... I am hopeful that you will consider moving as rapidly as technology will permit to the concept of passive restraints (air bags). I have to believe that a country which can put a man on the moon and analyze the soil of Mars can certainly perfect an air bag system that will achieve the significant reduction in deaths on our highways obviously possible from this effort. I am also convinced that mass production of such a system in vehicle fleets would hold the cost to a level that the people of this country could readily accept in relation to the potential for the saving of their lives."

INSURANCE AGENTS: The Independent Insurance Agents of America joined the other major insurance organizations in calling on Coleman to require passive restraints beginning with the 1980 model year. The organization said "the cost of maintaining and installing such safety devices is considered to be well within the means of American motorists."

FIELD TESTING: General Motors feels that "... a significant number of people already are using the only two passive systems that appear to be viable methods for meeting the proposed test requirements. Attempts should be made to get the maximum possible amount of data from these existing fleets."

Ford, on the other hand, suggested a more extensive field testing program. Under its proposal, there would be a 200,000 car test fleet with the first cars available in 1980. Results showing effectiveness estimates would be available in the middle of 1982. Ford said that it is willing to make a commitment to support such a program.

The Insurance Institute for Highway Safety and others said, however, that a field test "is not needed and indeed could further delay introduction of improved passive protection levels in American cars. More than enough evidence exists to overwhelmingly demonstrate the feasibility, practicability and effectiveness of passive protection systems."

Passive Protection Below Air Bag Deployment Speeds

It is noteworthy that regardless of the crash speeds at which manufacturers variously design their air bags to deploy, the passive protection they provide is an addition to – a strengthening of – the passive protection already present as a baseline because of prior DOT minimum standards and manufacturer's initiatives. Much of this already-present protection – for example, in the case of crash padding and strong door locks – functions below the 12 mile per hour speed mentioned in the Hearing, as well as above. It is not as if a passive restraint requirement would start passive crash protection at the air bag deployment speed, leaving the occupants unprotected at lower speeds, but rather that they already have several kinds of passive protection at lower speeds to which the proposed passive restraint requirements would be an additional and substantial improvement.

From the Insurance Institute for Highway Safety
Transmittal to Secretary Coleman

Public Acceptance: Safety Belts

Letters to Secretary Coleman from public officials, safety organizations, auto makers, insurance companies and others voiced overwhelming support for belt use. But most of them also raised serious doubts about the federal government's ability to convince states that they should enact mandatory belt use laws.

ELECTED OFFICIALS: Federal and state officials were vociferous in their criticism of a federal safety standard that would make belt use mandatory. Speaker of the House Carl Albert wrote Coleman, "Apart from the obvious impracticality of enforcing such a law, the infringement on the liberties of our citizens must be considered I am concerned that enactment of mandatory federal [belt wearing] standards would encroach on these liberties."

Governors, as well as state representatives and senators, criticized what a number of them called federal "blackmail." Governor Robert Straub of Oregon said, "Since the federal government does not have the power under the Constitution to directly pass traffic safety laws, such as a mandatory safety belt use law, it should not have the authority to coerce a state to pass this law under threat of the loss of federal funds."

Wendell Anderson, Governor of Minnesota, called such a federal requirement "damaging" because it "would once again put the federal government in an adversary role with several states."

Governor Patrick Lucey of Wisconsin said that he personally supported mandatory belt use laws but pointed out that "opponents – who see such attempts as 'big brotherism' – are very vocal. Chances of getting a law of this kind in the near future are dim, if not nil."

The Governor of Montana, Thomas Judge, said that the policy of his state "when applied to traffic laws dictates that 80 percent compliance to a specific requirement should be attained before a law is enacted to mandate the requirement. From our experience, it is also apparent that a law mandating a requirement beneath this percentum level is not enforceable. Consequently, my administration would be opposed to a national standard requiring State mandatory belt usage laws."

SUPPORT FOR LAWS: Support for mandatory use laws did come, however, from several safety and consumer organizations. The National Safety Council proposed a federal standard "which would give the states the option of mandating safety belt usage or bringing usage up to an acceptable level through education or some other means. The level of acceptability should be no lower than 70 percent."

Consumers Union supported mandatory passive restraint systems *and* mandatory state safety belt use laws. CU said these were "the only two of the five listed alternatives that promise significant reduction of highway deaths and injuries."

The Insurance Institute for Highway Safety said that mandatory belt use laws are "desirable" and do not conflict with a passive restraint standard.

The California Traffic Safety Foundation pointed out that while it favored mandatory belt use laws, "Honestly, we do not believe such a law can be passed at the present time in the State of California."

The American Mutual Insurance Alliance explained that it had worked for several years to promote such legislation, but “our many years of experience in state legislatures have caused us to reach the conclusion that while such laws may be desirable, their widespread adoption is unlikely. Even if some such laws were passed, the prospect of practical enforcement or even the acquisition of adequate funds for such enforcement is not bright. In short, we don’t have much confidence that either voluntary action or statutory compulsion can get American motorists to buckle up their seat belts in adequate numbers to provide an acceptable level of protection.”

Another supporter of such laws also raised doubts about their effectiveness. Susan Baker, associate professor at the Johns Hopkins University School of Hygiene and Public Health and a member of the National Highway Safety Advisory Committee, told Coleman that it would be a mistake to assume that an observed daytime 70 percent belt usage rate equals a 70 percent usage rate in potentially fatal crashes. She explained that people “driving at night, for example, are more likely to be involved in life-threatening crashes – yet seat belt legislation may be least effective at night when non-use is hardest to detect.”

She also pointed out that Canadian belt use laws had little effect on teenage drivers – another high risk group. “I make this point not because I oppose seat belt legislation (on the contrary, I have worked hard for such laws and still believe we need them), but because inflated estimates of potential benefits will lead to disappointment if legislation is ever enacted. Even more important, the published estimates could mislead you and others into believing that seat belt laws offer a reasonable alternative to passive restraints,” Baker said.

AUTO MAKER SUPPORT FOR BELT LAWS: Auto makers continued to support public education programs and the eventual passage of mandatory belt use laws. Ford Motor Co. called for “a program for immediate industry-government action to increase public knowledge of the benefits of using seat belts, and pave the way for adoption of mandatory belt usage laws”

General Motors Corp. expressed doubts that such legislation could now be enacted. “Accordingly,” GM said, “we believe that it would be appropriate to carry out a public education program of sufficient duration and scope to effect a significant attitudinal change before enacting such a law.” GM also called for insurance premium reductions for belt use.

On the subject of belt use and “unreasonable risk,” American Motors said that motorists do not assume an unreasonable risk of death on the nation’s highways. GM, agreeing, said that the interiors of current passenger vehicles incorporate a number of occupant safety features to “establish a reasonable minimum level of protection.” According to GM, seat belts provide an occupant “with a convenient means of further protecting himself.”

Renault, however, said that the “reluctance of automobile users to wear seat belts exposes them to unreasonable risks, and the government should therefore take some action . . . individual freedom does not include the right to suicide; neither does it include the right to crowd hospitals because of accidents which could have been avoided, not to impose on society the burden of caring for the dead and injured who could have been saved by mandatory belt usage.”

Coleman Receives More Passive Restraint Data

INSURANCE FOR REPLACING AIR BAG SYSTEMS: Nationwide Insurance Co. provided Coleman with estimates on the cost of providing insurance coverages for air bag replacement in the event of deployment. Based on a replacement cost of \$200, Nationwide estimated that “the insurance cost for air bag replacement would be \$0.94 per insured car.”

In a covering letter to Coleman, Nationwide said, “the number of annual deployments and the replacement cost obviously are primary factors in calculating the effect air bag replacement has on insurance premiums. However, even if maximal available cost was used, the effect on the physical damage premium would be slight. Thus, the estimated insurance savings of air bags is reduced very little by a premium increase needed to pay for the cost of air bag replacements.”

PASSIVE BELTS: Volkswagen of America, Inc. corrected a statement it had made at the August 3 hearings on passive restraints. At that time, Volkswagen stated that the present passive belt system available in some of its Rabbit models would not meet the lateral crash protection requirements of the secretary’s mandatory passive restraint proposal.

Following discussions with National Highway Traffic Safety Administration officials, however, Volkswagen found that it met the criteria of the standard under a separate provision stating that a passive belt could be used in place of the active belt required under the proposed standard. (NHTSA also ruled that although the Volkswagen system can be disconnected, it meets the criteria of the standard because disconnecting the belts prevents the car from starting.)

The National Motor Vehicle Safety Advisory Council sent a letter to Coleman which pointed out that the “largest car fleet equipped with a passive restraint system and presently available to the American public is the Volkswagen ‘Rabbit’ – and it is not an air bag option.” (Volkswagen estimates that there are now 50,000 passive belt-equipped Rabbits in operation.)

The NMVSAC passed a resolution expressing “its hope that, on a priority basis, the Department will compile accident information on this particular car model for use in guiding future policy.”

In its submission to Coleman, General Motors also touched on the subject of passive belt systems. GM said that its rollover test led it to conclude that “it would be necessary to combine an active belt with the passive shoulder belt to provide occupant protection equal to that provided by use of active lap shoulder belts over the full range of accident conditions.”

IMPACT ON FUEL CONSUMPTION: Passive restraints in all cars “would have the greatest impact of all the proposals, but only a nominal impact on our energy supply,” according to the Department of the Interior. “The alternative would increase consumption in the transportation sector by about 24,000 barrels of oil equivalent per day. When compared to projected overall transportation use of 10 million barrels per day it may be considered insignificant,” the department said in reply to an inquiry from Secretary Coleman. The Department of the Interior had calculated the effect his five proposals would have on the nation’s energy supply.

AUTO MAKERS PROVIDE AIR BAG COST ESTIMATES: The major domestic auto makers supplied Coleman with information on the cost of air bag systems. General Motors, the company that has done the most work on the system, offered the lowest estimate for a future system – \$220.

Chrysler Corp. provided a total cost estimate for full front seat air bag protection of \$371. It acknowledged, however, that because “we do not have a ‘future production system’ under development, our estimate is based on a previously conceived system”

American Motors Corp. did not provide any figures to NHTSA, saying, "We have not production-engineered an air cushion system installation. We are therefore unable to give meaningful estimates which require us to assume that we currently market, or in 1980 will market, vehicles that are equipped with this type of restraint."

Figures were provided by General Motors and the Ford Motor Co. The following table compares the GM and Ford estimates with those of the National Highway Traffic Safety Administration and the DeLorean Corp. The John Z. DeLorean Corp. is an automotive consulting firm that prepared cost estimates at the request of Allstate Insurance Co. DeLorean was formerly GM vice president for North American operations.

The following costs are for full front seat air bag protection in a mix of vehicles. They do not reflect the savings that will be realized by the elimination of shoulder belts.

- An NHTSA official told *Status Report* that its estimates will be revised in the near future.

AIR BAG COST ESTIMATES					
ITEM	NHTSA	DeLOREAN	GM		FORD
			PRESENT	FUTURE ^a	
Equipment					
Sensor	\$ 5.00 ^b	\$ 25.00	\$ 33.00	\$	\$ 35.00
Inflator and distributor	36.00 ^c	40.00	46.00		80.00 ^d
Air bag pack and cover	13.00	14.00	28.00		4.00 ^e
Knee padding	6.00	0.00	4.00		19.00
Quality control			10.00		
SUBTOTAL	60.00	79.00	121.00	91.00	138.00
Vehicle Manufacturing					
Steering column structure	1.50	0.00	20.00		1.00
Instrument panel structure	1.25	0.00	5.00		7.00
Assembly	5.00	10.00	9.00		5.00
Warranty	3.75	0.00	19.00		7.00
Tooling ^f	5.00	— ^g	39.00		6.00
Engineering	3.00	0.00	— ^h		21.00
Facilities and launching	3.00	0.00	— ^h		4.00
SUBTOTAL	23.00	10.00	92.00	85.00	51.00
Markups					
Manufacturing	12.40	13.00	0.00		9.00
Dealer	20.60	25.00	53.00	44.00	47.00
SUBTOTAL	33.00	38.00	53.00	44.00	56.00
TOTAL	\$116.00	\$127.00	\$266.00	\$220.00	\$245.00

^a Details not provided. ^b Includes only a single sensor, does not include diagnostics, warning circuits or wiring.

^c Does not include a mounting plate. ^d Includes bag. ^e Cover only. ^f GM tooling amortized over 1 year, NHTSA and Ford 5 years. ^g Included in assembly costs. ^h Included in warranty costs.

Objections Raised To Mandatory Optional Restraints

Secretary Coleman's proposal that automatic restraints be mandated as an option on at least some new cars met with a variety of objections from the Center for Auto Safety, several auto makers, the Insurance Institute for Highway Safety and others. There was support for this proposal, however, from some state officials.

The Center for Auto Safety argued that the "mandatory option" approach would be illegal under the terms of the National Traffic and Motor Vehicle Safety Act of 1966. The center pointed out that Secretaries of Transportation John Volpe and Claude Brinegar both asked that the 1966 Act be amended to

Summary, "A Critique of the Benefit/Cost Analysis Accompanying the Announcement of the August 3, 1976 DOT Public Hearing on Motor Vehicle Occupant Crash Protection."

This analysis identifies three major omissions in the DOT benefit/cost analysis:

1. The statement in the announcement equating 70 percent lap and shoulder belt use with the benefits of air cushions with 20 percent lap belt use deals only with gross numbers of lives to be saved in crashes of all varieties and does not consider the superior protection of air cushions compared to lap and shoulder belts in severe frontal crashes and, separately, the need for lap belts in nonfrontal crashes.

A level of 70 percent belt use, it is generally agreed, would be practically impossible to obtain in the United States. However, if all cars were equipped with air cushions, and *if* 70 percent lap belt use could be obtained, a total of 14,700 lives would be saved annually – about 3,300 more lives per year than would be saved by 70 percent lap and shoulder belt use. Furthermore, relative use rates of lap and shoulder belts indicate that lap belt use is more easily obtained than shoulder belt use.

2. DOT's assumptions as to fatality reductions that accompany given levels of belt use are *not* supported by the Ontario belt law experience. There deaths have failed to drop to the levels expected from observed belt use – if the DOT assumptions are valid. Moreover, observed belt use in Ontario has not been maintained at 70 percent.

3. While all of the costs of air cushions are considered in the DOT analysis, all of the costs of obtaining high belt usage, if such could be gained and maintained, are not included. Assigning dollar costs to public discomfort and inconvenience of enforced belt use, however, may be just as questionable as assigning dollar benefits to saving lives. Nonetheless, failure to consider all such costs results in underestimation of the overall societal costs of enforced belt use.

The saving of thousands of lives at DOT's estimated additional lifetime cost of \$103 per new car is more than enough justification to require passive restraints. The issue is more one of human values than of economics.

From the Insurance Institute for Highway Safety
Transmittal to Secretary Coleman

allow the gradual phase-in of motor vehicle safety standards. In 1974, two bills were introduced in the Senate providing for such phase-in authority. Both died in committee, despite other Senate action that year on motor vehicle safety standards. "In other words," the center said, "Congress reaffirmed, in 1974, its original decision to require uniform safety standards for vehicles of the same type."

IIHS pointed out that the mandatory option alternative "would deny such automatic protection, when the original purchaser failed to buy the option, to all other occupants, and to subsequent owners."

General Motors, along with other auto makers, offered a different argument against mandating optional passive restraints. GM said it "would force manufacturers to incur large development and tooling costs for a product which has little expected customer demand." "From a practical standpoint," GM said, "this alternative may be the least desirable of the five."

Renault also cited the mandatory option as the least acceptable alternative. American Motors said it "is strongly opposed to the proposition that automobile manufacturers provide consumers with the option of passive restraints in some or all of their models unless there is a strong public demand for passive restraints."

There was some support for this proposal from public officials. California's Business and Transportation Agency called the proposal, "the best available compromise." An official of the Delaware Department of Transportation said it "would once again place personal option above bureaucratic dictation."

Air Bag Crash Deployments In High Mileage Cars

It is noted that air bags have been deploying, and properly so, in crashes of cars that have accumulated high mileages – mileages substantially greater than average for cars of their ages. The following is a list of those with odometer readings over 48,000 miles.

HS NO.	CAR	PLACE	DATE	ODOMETER READING
602567	'72 Mercury Monterey Custom	Brooks Co., Ga.	8/22/75	63084
602526	'74 Oldsmobile 98 Regency	Mayhew, Miss.	2/19/75	53754
602527	'73 Chevrolet Impala	Houston, Tex.	3/15/75	63695
602561	'73 Chevrolet Impala	Somerville, Ala.	3/18/75	90445
602600	'73 Chevrolet Impala	San Antonio, Tex.	5/08/75	61830
602562	'73 Chevrolet Impala	Dalton, Ga.	5/09/75	50663
602681	'73 Chevrolet Impala	Landover, Md.	5/21/75	48795
602928	'73 Chevrolet Impala	Needles, Ca.	6/07/76	67333
602750	'73 Chevrolet Impala	Milford, Mich.	7/09/75	49320
602965	'73 Chevrolet Impala	Seattle, Wash.	1/01/76	57165
603020	'73 Chevrolet Impala	West Bloomfield Township, Mich.	4/11/76	69255
603019	'74 Oldsmobile Delta 88	Ventura Co., Ca.	4/21/76	48975

From the Insurance Institute for Highway Safety
Transmittal to Secretary Coleman

Recommendations

The Insurance Institute for Highway Safety believes that the information, analyses and conclusions in . . . this transmittal to the Secretary's August 3 Hearing and the FMVSS 208 Docket as a whole, compel the following recommendations for action by the Secretary:

- Mandate new-car passive restraint protection for front-seat occupants in frontal crashes, as proposed in the FMVSS 208 Notice of Proposed Rulemaking, "Alternative IV," contained in the Secretary's announcement of June 9.
- In the interim, continue the present, three-option FMVSS 208 occupant restraint standard.
- Develop and implement, in cooperation with the Congress, States and the private sector, such "Alternative II" and other programs as will, in the Secretary's judgement, effectively bring about substantial increases in active safety belt use levels in cars already on the highways.

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