

Status Report

Congressmen Protest GAO Restraint Study

Fifteen members of the House Commerce Committee have protested an unannounced General Accounting Office (GAO) review of the passive restraint ruling and have insisted on the committee's right to be consulted before the study is concluded.

Responding to the Congressmen's sharply worded letter, Elmer B. Staats, comptroller general and head of the GAO, agreed it had been a mistake not to meet with the committee months ago and promised, "In completing our work, we will give full consideration to the committee's interest."

The committee's interest is long-standing. After the Secretary of Transportation announced in the summer of 1977 that increased levels of automatic crash protection will be required in passenger cars beginning with certain models in the 1982 model year (See *Status Report*, Vol. 12, No. 12, July 26, 1977), the Subcommittee on Consumer Protection and Finance held extensive hearings and recommended the DOT rule be approved. The full committee voted its support, as did the full Senate. (See *Status Report*, Vol. 12, No. 14, Sept. 26, 1977, and Vol. 12, No. 16, Nov. 8, 1977.)

Signers of the protest to the GAO included both Rep. Harley O. Staggers (D.-W.Va.), committee chairman, and Rep. Bob Eckhardt (D.-Tex.), chairman of the subcommittee.

"There are several things which cause us grave concern about the way in which the report appears to be being prepared," the group told Staats. The Congressmen complained that the committee was neither notified nor consulted "in an area in which we not only have expertise, but also recently conducted a rather intensive study." The origin of the study also puzzled the committee, and "why the agency felt great reluctance to say where it originated." After giving conflicting explanations of the study's origin, the Congressmen said, the GAO finally indicated it was self-generated.

REVIEW BEING MADE IN DETROIT

"Although a self-generated report is certainly legal and proper in an area of national policy," wrote the Congressmen, "a further cause for concern exists — the report is being prepared by your Detroit regional office, the home city of the industry which has opposed the rule from its inception."

In his response, Staats agreed the review was "a GAO self-initiated effort started in August 1977." He said it was based on the GAO's continuing interest in automobile safety, on intense Congressional interest in passive restraints, and on "related questions" stemming from the Detroit regional office's review of standards applying to light trucks and vans.

"Although we did not complete our work in time for the subcommittee hearings on the mandate," Staats said, "we decided to continue the work because of the widespread Congressional interest that was

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Congressmen Protest GAO Restraint Study (Cont'd from page 1)

evidenced by the number of Congressional contacts with our office. Also, statements were made during the hearings, suggesting we would be asked to review the basis for the passive restraint cost estimates prepared by the Department of Transportation and the automobile industry."

The study was expanded, Staats explained, to include effectiveness of passive belts and air bags and costs of the restraint systems, including replacement costs and insurance costs and savings.

The Congressmen supplemented their letter to the GAO with a series of recommended questions on passive restraint effectiveness, on costs, on potential insurance savings, and on the use of sodium azide in air bag inflators. In addition, they urged the GAO to interview a list of individuals and companies which they believe might have something of value to contribute.

The list was prepared after committee staff members met with GAO representatives to investigate reports that a study was under way. That meeting was not entirely satisfactory, the Congressmen indicated, because "what information they provided to our staff about the general direction of the report indicated that they have chosen an essentially backward-looking set of questions rather than study the new information which was not available to the Congress at the time of its review."

The Congressmen warned against GAO's damaging its reputation with "an inadequate or biased report," and concluded: "While it is unfortunate that our input must be made at this late date, we are compelled to insist upon it, due to the critical nature of the study."

HLDI Ranks Best And Worst '78 Models On Loss Record

The four-door Chevrolet Nova showed the best collision loss experience of all "high volume" 1978 cars, and the two-door Toyota Celica the worst, the Highway Loss Data Institute (HLDI) has reported.

The high-volume classification includes those cars that have at least one percent of the total exposure for the model year, and therefore represents the bigger selling cars. In the "low volume" category — those cars with less than one percent of the total exposure — the Honda Civic station wagon topped the list of models with the best collision loss experience and the Chevrolet Corvette showed the worst record.

These findings are reported in a new HLDI study of collision coverage losses for 1978 models in their first full year on the road, 1977 models for their first two years, and 1976 models for their first three years.

Last October, HLDI issued a preliminary ranking of 1978 models on collision coverage loss experience, based on reports of the first nine months of the model year (See *Status Report*, Vol. 13, No. 14, Oct. 11, 1978.) At that time all models were grouped together to obtain the ranking, with no distinction made between high-volume and low-volume cars.

In HLDI's current ranking of the five best high-volume and five best low-volume 1978 models, six cars were four-door models and three were station wagons. Only one subcompact — the Honda Civic station wagon — and one two-door model — the Chevrolet Nova — made the list. No sports or specialty models were included. Of the 10 cars with the worst experience in both volume categories, seven were subcompacts and three were specialty models.

Collision loss experience ranged widely between the best and the worst vehicles. For example, the two models with the worst records (the Chevrolet Corvette and the Volkswagen Scirocco on the low-volume list) each had a relative average loss payment per insured vehicle year more than double the average for all

vehicles combined (see table). In contrast, models with the best records (the Honda Civic station wagon and the four-door Oldsmobile Omega on the low-volume list) each had a relative average loss payment per insured vehicle year less than one-half the overall average.

For 1977 model year cars, the Dodge Aspen station wagon showed the best record among high-volume cars for relative average loss payment per insured vehicle year, at 65 (where 100 represents the average for all 1977 models combined), while the Pontiac Firebird, a specialty model, had the worst showing at 175. Among the 1976 models, the four-door Chevrolet Impala ranked first in the high-volume list in relative average loss payment per insured vehicle year at 61, and the Pontiac Firebird was at the bottom of the rankings at 189.

Other principal findings of the HLDI report included:

- For both 1977 and 1978 models, claim frequencies, average loss payments per claim, and average loss payments per insured vehicle year varied greatly with vehicle size. Results for both model years were highest for the subcompacts and lowest for the intermediates. For the 1976 models, the full-size group had the lowest and the subcompacts had the highest losses among the four car size groups.

- Small cars dominated the 1978 model year exposure. Subcompact and compact models together accounted for 66 percent of the total exposure for 1978 models compared with 40 percent of the exposure for the same sized 1977 models.

- For all three model years, the average loss payments in each size group were by far the highest for sports or specialty models. Among compacts, intermediates, and full-size models, the averages were higher for regular two-door models than regular four-door models.

Copies of the report, *Automobile Insurance Losses, Collision Coverages: Variations by Make and Series (HLDI R78-2)*, may be obtained from the Highway Loss Data Institute, Watergate 600, Washington, D.C. 20037.

RELATIVE AVERAGE LOSS PAYMENTS PER INSURED VEHICLE YEAR¹
FOR 1978 MODEL YEAR CARS WITH THE BEST AND WORST
COLLISION COVERAGE LOSS EXPERIENCE

	BEST CARS				WORST CARS			
	MAKE & SERIES	BODY STYLE	CAR SIZE	RELATIVE AVG. LOSS PAYMENT PER INSURED VEHICLE YEAR*	MAKE & SERIES	BODY STYLE	CAR SIZE	RELATIVE AVG. LOSS PAYMENT PER INSURED VEHICLE YEAR*
HIGH VOLUME (At least 1% of Total Exposure)	Chevrolet Nova	4-Door	C	53	Toyota Celica	2-Door	SC	188
	Chevrolet Nova	2-Door	C	62	Pontiac Firebird	Specialty	C	183
	Chevrolet Impala	4-Door	I	63	Toyota Corolla	____ ²	SC	132
	Buick Le Sabre	4-Door	I	66	Chevrolet Camaro	Specialty	C	129
	Chevrolet Caprice	4-Door	I	68	Chevrolet Monza	2-Door	SC	128
LOW VOLUME (Less than 1% of Total Exposure)	Honda Civic	Sta. Wgn.	SC	40	Chevrolet Corvette	Sports	SC	237
	Oldsmobile Omega	4-Door	C	45	Volkswagen Scirocco	2-Door	SC	203
	Buick Skylark	4-Door	C	52	Datsun 280Z	Sports	SC	195
	Mercury Zephyr	Sta. Wgn.	C	54	Lincoln Mark V	Specialty	FS	153
	Chevrolet Caprice	Sta. Wgn.	I	55	Plymouth Arrow	2-Door	SC	153

¹Results are standardized to the distribution:

	YOUTHFUL DEDUCTIBLE	NO YOUTHFUL OPERATOR	NO YOUTHFUL OPERATOR
\$ 50		5%	35%
\$100		15%	45%

²Body style cannot be determined from Vehicle Identification Number.

Subcompact (SC) — cars with wheelbases less than or equal to 101 inches.

Compact (C) — cars with wheelbases greater than 101 inches and less than or equal to 111 inches.

Intermediate (I) — cars with wheelbases greater than 111 inches and less than or equal to 120 inches.

Full-Size (FS) — cars with wheelbases greater than 120 inches.

*100 represents the overall average for all 1978 models combined and is equivalent to \$93 per insured vehicle year

Federal Agencies Study Multipiece Wheel Problems

Two federal agencies say they will soon propose safety standards aimed at curbing the dangers of multipiece wheel explosive separations.

Responding to a petition from the Insurance Institute for Highway Safety, the National Highway Traffic Safety Administration (NHTSA) said it has begun rulemaking action to require that multipiece wheels retain their components under blow-out or run-flat conditions. The rule urged by the Institute in effect would ban the manufacture of hazardous multipiece wheels, which are commonly used on trucks, buses, and campers. NHTSA said it expects to propose a standard governing the wheels sometime before the middle of February.

A safety standard to protect tire service personnel against multipiece wheel mishaps will be issued shortly by the Occupational Health and Safety Administration (OSHA), according to its director, Dr. Eula Bingham. Bingham made her prediction in response to a letter from Rep. John E. Moss (D.-Calif.), whose oversight subcommittee of the House Commerce Committee recently investigated hazards associated with the multipiece wheels.

In asking Bingham when OSHA planned to take action against the hazards, Moss had said that "over 90 deaths and 200 serious injuries resulting from the explosion of multipiece rims in tire service shops and on the road have been documented," and that an OSHA standard would benefit 332,000 people who service multipiece wheels in over 102,000 workplaces. Moss added that an economic analysis performed for OSHA of a possible multipiece wheel safety standard concluded that it would "entail no significant adverse economic consequences."

Bingham told Moss that her agency expected to propose the safety standard before the end of 1978. However, an OSHA spokesman told *Status Report* the standard is being redrafted. There is a "good chance" it will be proposed in late January, he said.

Multipiece wheels have a detachable locking ring which is fitted around the tire rim in order to hold the tire in place once it is inflated. The pressure of an inflated tire or a relatively slight change in tire pressure can cause the ring to separate violently from the wheel without warning, "killing or dismembering people working on the tire or simply walking or driving by," William Haddon, Jr., M.D., IIHS president, has explained (See *Status Report*, Vol. 13, No. 14, Oct. 11, 1978.).

Seat Belt Use Declines; Discomfort And Inconvenience Cited

Only 14 percent of the nation's drivers use their safety belts, the National Highway Traffic Safety Administration (NHTSA) has reported.

Announcing the results of a belt-use study and a related study of motorist attitudes toward safety belts, Joan Claybrook, NHTSA administrator, said that belt "comfort and convenience are causes for concern."

In a NHTSA-backed project, Opinion Research Corp. of Princeton, N.J., observed nearly 70,000 drivers in 19 cities throughout the U.S., from November 1977 through June 1978. Belt use was reported highest on the West Coast, where 18.5 percent of the drivers were seen wearing belts, Claybrook said.

Earlier this year, NHTSA had pegged 1978 belt-use levels at 16 percent nationwide, down from 18.5 percent during 1977. (See *Status Report*, Vol. 13, No. 13, Sept. 20, 1978.) The study confirmed earlier

findings that women tend to buckle up more frequently than men. The study also revealed that drivers of subcompacts, particularly foreign imports, tend to use their seat belts more often than drivers of full-sized autos.

In a second study, Claybrook said that the Verve Research Co. of Rockville, Md., found numerous problems associated with comfort and convenience of seat belts in both domestic and imported autos. The researchers selected 30 current model cars for evaluation of safety belt comfort and convenience by 114 licensed drivers from Detroit. NHTSA said it was beginning to view comfort and convenience as “factors which lead to non-use” of seat belts, and urged auto manufacturers to conduct similar studies.

Safety belt usage was measured by Opinion Research on turnpikes and rural roads, as well as in metropolitan areas. Only 7 percent of the people driving on rural roads were seen using their seat belts, the researchers reported, compared to 17 percent of the drivers on turnpikes.

Usage was highest (78 percent) in Volkswagen Rabbits equipped with passive belt systems, although nearly one-quarter of the passive systems had been defeated by drivers. An Opinion Research spokesman noted that Volvos and Rabbits equipped with active belt systems had the next highest usage with 34 percent of their drivers observed wearing restraints. The lowest belt use rating went to Ford drivers, who were seen wearing belts only 10 percent of the time.

Other findings in the belt use study indicated:

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Safety, Property Damage Changes Estimated At \$5.75 A Car

Based on figures supplied by manufacturers, the retail value of changes made in 1979-model domestic passenger cars to comply with property damage and safety standards averaged only \$5.75 per vehicle over the 1978-model costs, the Bureau of Labor Statistics (BLS) has reported.

The figure comprises less than 2 percent of the average price increase of \$300.30 reported by BLS for the new models. Overall, BLS estimated that “quality changes” other than those required to comply with safety and damage-resistance standards, added \$40.60 to the average retail cost of the new models – some 14 percent of the total price increase. Other quality changes included improved engine and chassis designs to provide better vehicle performance and corrosion protection, and redesigned emission-control systems to meet air quality standards.

The estimates were based on a comparison of data for similarly equipped 1978- and 1979-model domestic passenger cars, BLS said. Manufacturers supplied data for the 16 domestic cars priced for the Producer Price Index – formerly the Wholesale Price Index.

According to a BLS spokesperson, the types of changes made in the new cars included reinforcing bumper systems in response to a federal standard adopted to reduce low-speed crash damage – Federal Motor Vehicle Safety Standard (FMVSS) 215–Part 581 – and weather-stripping windshields and strengthening their interior moulding in response to FMVSS 212, which sets requirements providing for vehicle windshield retention during crashes.

Seat Belt Use Declines; Discomfort And Inconvenience Cited (Cont'd from page 5)—————

- For 1976-78 models, driver belt use in subcompacts was 20 percent; in compacts, 13 percent; and in intermediates and full-sized cars, usage was pegged at 10 percent.
- Belt-use levels were highest (17 percent) in cars equipped with continuous light-buzzer reminder systems and starter interlocks on 1972-74 models.
- In vehicles equipped with separate lap and shoulder belts (1968-1973 model years), belt usage was pegged at 3 percent for drivers using both belts and 14 percent for lap belts only.
- Cars manufactured between 1964 and 1967 had a driver belt use rate of only 11 percent.

Heavy Response To Proposed Child Restraint Upgrading

More than 100 comments — most of them wide-ranging and some critical — have been received by the National Highway Traffic Safety Administration's (NHTSA) proposed rulemaking to require that child restraints meet dynamic test requirements.

The cut-off date for comments had been Dec. 1, but the agency agreed to extend the period to Jan. 5 for comments concerning the proposed dynamic test requirement. The proposed rules would require restraints for infants and young children to protect the youngsters in 30 mph head-on crashes by setting test criteria using anthropomorphic dummies. Under the new provisions, limits would be set on head and chest injury, and the restraints would be required to retain the test dummies without structural damage to the system, with a minimum of head and knee movement. The proposed rules would amend FMVSS 213 and 209 to cover all types of child restraints intended for motor vehicle use, including previously unregulated car beds and infant carriers. (See *Status Report*, Vol. 13, No. 7, May 31, 1978.)

Particularly heavy criticism was leveled in some comments at a provision that would, in effect, set a double standard for certain kinds of restraints. All restraints would be required to meet the 30 mph head-on crash test provision when installed "in accordance with manufacturers' instructions." Some restraints are equipped with top tethers that should be fastened to an anchor mounted on the body of the vehicle, to provide further security. An additional 20 mph crash test would be required for this type of restraint when held in place by the vehicle lap belt only.

SINGLE 30 MPH TEST URGED

While General Motors called for an overall reduction in the dynamic test from 30 mph to 20 mph, most critics contended that NHTSA should require all restraints to protect children and infants in 30 mph crashes even when anchored only by lap belts. The Insurance Institute for Highway Safety and the Center for Auto Safety, among others, pointed out that most parents fail to install and utilize the anchorages necessary to secure tethers. (See *Status Report*, Vol. 13, No. 16, Nov. 17, 1978.)

One manufacturer of child restraints, Bobby-Mac Co., Inc., of Scarsdale, N.Y., criticized the "double standard" and predicted that most top tether restraints would be able to meet the 30 mph test requirements with tether attached, as well as the 20 mph impact secured only by a lap belt. However, the manufacturer said the latter test "may be inadequate to eliminate those restraints that are not crashworthy when used without a tether in real-life situations."

Many critics also asked NHTSA to require that lap-type belts be installed in all cars equipped with passive belt systems. Currently, some VW Rabbits are equipped with passive belt systems in the front seat

positions. These provide only a diagonal shoulder belt and a knee bar, and no lap belt. The cars do, however, have lap belts in the rear. Action for Child Transportation Safety (ACT) said that although Volkswagen suggests that children ride in the rear seat, “we know that parents will not always carry children only in back, especially a small baby or car pool passenger.”

Among other comments aimed at the proposed rulemaking:

- Bobby-Mac and the American Academy of Pediatrics (AAP) warned that the “inertia reel one-piece lap/shoulder belt which has the sliding buckle tongue assembly” (such as those found on Volvos), pose a problem for parents. They said that inertia reels (usually found in the front seat positions) provide “give” for passenger comfort but are insufficient to hold child restraints securely on sharp curves or in panic stop situations.

- Many groups urged clear labeling requirements, including diagrams to show proper placement of child restraints, and a warning that improper use could endanger a child.

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Agencies Reach Agreement On Emergency Medical Services

The Departments of Health, Education, and Welfare (HEW) and Transportation (DOT) have signed an interagency agreement on emergency medical services.

Both agencies provide financial and technical assistance to state and local governments for emergency medical services under the 1966 Highway Safety Act, administered by the National Highway Traffic Safety Administration, and the 1973 Emergency Medical Services Systems Act, administered by HEW. The agreement is designed to avoid duplication of effort, with comprehensive national standards and procedures being adopted by both agencies. Last year, both agencies allocated about \$88 million to the states for emergency medical services.

The official summary of the agreement states:

The Memorandum of Understanding (MOU) delineates responsibilities relating to 15 different phases of an emergency medical service system. The DOT will be responsible for the pre-hospital or transportation functions while HEW will be responsible for medical standards and procedures for initial, supportive and definitive care. Two of the more important DOT functions relate to training and transportation. In the training area, DOT has prepared excellent material for first responders (fire, police, etc.)— Emergency Medical Technicians – Ambulance and Paramedics, communications dispatchers, and system coordinators and administrators. Where transportation is involved, DOT develops specifications for ambulances and special transportation surface vehicles and equipment both carried and installed (extrication, communications, medical), including emergency and safety specifications. Other phases of emergency medical services include manpower, communications, facilities, critical care units, consumer participation, accessibility to care, transfer of patients, coordinated medical record-keeping, consumer information and education, review and evaluation, disaster linkages, and mutual aid agreements.

The MOU also describes responsibilities for research and demonstration, funding and technical assistance, interagency cooperation, exchange of information, and working arrangements.

Heavy Response To Proposed Child Restraint Upgrading (Cont'd from page 7)

- GM asked NHTSA to consider bringing FMVSS 213 into conformance with an international standard that is currently being devised.
- Bobby-Mac pointed out that the prototype bench seat that NHTSA proposed for crash testing is actually much flatter than production seats found in most cars. The discrepancy could lead to the development of infant seats that would cause discomfort and the possibility of neck and vertebral injuries, the company said.
- AAP also called for lateral testing of restraints to give consumers an index of the overall crash-worthiness of a given restraint.
- Some consumer groups recommended that manufacturers be required to install tether anchorages for child restraints in cars, vans, and light trucks.
- Many groups urged NHTSA to move the scheduled implementation date of the standard up from May 1980 to May 1979.

New Members Join Institute Boards

Martin Albaum, vice president of research for the Prudential Property and Casualty Insurance Co., has been elected chairman of the board of directors of the Insurance Institute for Highway Safety (IIHS). New members named to the board are J. Dean Cassidy, senior vice president of the Continental Insurance Companies; James F. Wyatt, senior vice president of the Hartford Insurance Co.; M. Stanley Hughey, executive vice president of Kemper Insurance Companies; and W.J. Smith, vice president of Wausau Underwriters Insurance Co.

Other IIHS board members are Donald P. McHugh, vice president and general counsel of the State Farm Mutual Automobile Insurance Co.; George G.P. Knapp, senior vice president of Chubb & Son, Inc.; Frank E. Walton, senior vice president of the Travelers Insurance Co.; T. Lawrence Jones, president of the American Insurance Association; Donald E. Reutershan, executive vice president of the Sentry Group; Paul S. Wise, president of the Alliance of American Insurers; Charles A. Weeber, vice president and claims counsel of the United Services Automobile Association; Donald L. Schaffer, vice president, secretary, and general counsel of Allstate Insurance Co.; W.V. Siegfried, vice president of underwriting for the Nationwide Mutual Insurance Co.; and Arthur C. Mertz, president of the National Association of Independent Insurers.

Wayne W. Sorenson, vice president of research for the State Farm Insurance Companies, is the newly-elected chairman of the board of directors of the Highway Loss Data Institute. Serving with him are Martin Albaum; M. Stanley Hughey; Richard E. Munro, vice president of the Nationwide Insurance Co.; Brian E. Scott, assistant vice president of Aetna Life and Casualty; John S. Trees, group vice president of Allstate Insurance Co.; Frank E. Walton; Roger H. Wingate, executive vice president of Liberty Mutual Insurance Co.; and William Haddon, Jr., M.D., president of the Highway Loss Data Institute.

Helmets Cut Crash Odds For North Dakota Cyclists

A study by the North Dakota state government has found that crash deaths among unhelmeted motorcyclists in the state in 1977 and early 1978 outnumbered those among helmeted motorcyclists by 6 to 1.

The study also found that motorcycle crashes are “seriously underreported to the state’s traffic safety and law enforcement officials, and that unlicensed operators accounted for a large share of the recent motorcycle-related deaths and injuries in the state. In addition, it questioned the enforceability of a North Dakota law that only requires helmet use for motorcyclists below the age of 18.

The study, supervised by North Dakota’s state health officer, concluded that it is “in the public interest to encourage Congress and . . . state legislatures to adopt and retain mandatory helmet usage requirements.” It noted that as of September, 29 states, including North Dakota, did not require helmet use by all motorcyclists.

HEAD, NECK INJURIES FREQUENT FOR UNHELMETED

The researchers reported that of the 18 unhelmeted motorcyclists recently killed in the state, 17 died of head or neck injuries, while 1 of the 3 helmeted operators among the fatalities died of such injuries. Although total injuries among unhelmeted motorcyclists outnumbered those among helmeted motorcyclists by a 5 to 4 ratio, the corresponding ratio for head, face, or neck injuries was 3 to 1, the researchers said.

The findings corroborate research in other states, including Kansas, California, Colorado, Oklahoma, and South Dakota, which found an increased risk of injury and death associated with not wearing a helmet (See *Status Report*, Vol. 13, No. 16, Nov. 17, 1978, and Vol. 13, No. 12, Aug. 21, 1978.)

In tallying the number of motorcycle crashes in 1977, the researchers found that 361 were reported to the state’s Traffic Safety Division. However, in checking other sources including doctor and hospital records, the researchers discovered that an additional 410 crashes – or 53 percent of the 771 finally identified – had not been reported to the division.

“The lack of comprehensive coverage in the reporting of motorcycle accidents must be considered a major deficiency in the nationwide analysis of information regarding such accidents,” the study asserted, noting that other researchers also have concluded that motorcycle crashes are seriously underreported to traffic safety and law enforcement officials.

MANY CYCLISTS WERE UNLICENSED

The study also reported that of the motorcycle operators injured and of those killed in recent crashes identified in the state, just over half were unlicensed. Of the 615 motorcycle operators injured in the 1977 and 1978 crashes analyzed, 308 – or 50.1 percent – were unlicensed. They study said 9 of the 17 operators killed in those crashes had no license. No significant difference was found in the fatality rates of the licensed and unlicensed operators studied, nor in their helmet-use rates. Two possible courses of action may be warranted, the study said. These are a “stricter enforcement of licensing provisions,” and “instituting a required precicensing safety course stressing the utility of protective safety helmets.”

The researchers concluded that their findings bring “into serious question” the enforceability of a North Dakota law that requires helmet use only for motorcyclists below the age of 18. A “particularly disconcerting” discovery, they said, was that of the 385 injured motorcyclists below the age of 18 in 1977 and 1978 crashes, almost 40 percent were not wearing a helmet, despite the law.

Auto Makers Protest Seating Position Rule

Because in some new cars there is seating space for three front-seat passengers, but seat belts only for two, the National Highway Traffic Safety Administration (NHTSA) is proposing to redefine "seating position" so as to force manufacturers to provide belts in all three positions.

A proposed new NHTSA rule would designate as a seating position any seat area capable of accommodating a fifth-percentile adult female (a small woman), if the "overall seat configuration and design is such that the position is likely to be used as a seating position while the vehicle is in motion" As another guideline, the rule would require that any bench or split-bench seat "having greater than 50 inches of hip space shall have not less than three designated seating positions."

Auto makers, several of whom were warned last year that certain models did not provide adequate occupant restraints for all seating positions (See *Status Report*, Vol. 13, No. 8, June 15, 1978), have filed comments resisting the proposed rule and seeking revisions.

American Motors said that the agency has failed to support its assertion that the absence of a restraint system for the front center seat passenger in some vehicles poses a "serious threat" to safety. An in-house survey of 1971 accident data files indicates a center front seating position use rate of less than 5%, the manufacturer said. It suggested that the occupancy rate in the newer down-sized cars is "even lower."

Chrysler Corp. and Toyo Kogyo Co., manufacturer of the Mazda, expressed confusion over the number of seating positions that might be required for a bench or split-bench seat having 50 or fewer inches of hip space. They noted that three seating positions could be designated for fifth-percentile females, but asked NHTSA whether the "hip space" provision of the rule unconditionally permitted the designation of two seating positions.

In proposing the rule, NHTSA said the hip space provision "does not mean that some vehicle seats with less than 50 inches of hip space should not also have more than two designated seating positions. The specification is merely the amount of space the agency will consider as conclusive evidence that there should be at least three designated seating positions." Several manufacturers recommended the measurement of shoulder space, as contrasted to hip space, in determining seating positions.

Most of the commenters also claimed a need for more lead time to comply with the rule, which has proposed effective date of Sept. 1, 1979.

UPDATE . . .

VIN REVISION SUPPORTED: The Insurance Institute for Highway Safety (IIHS) has told NHTSA it supports the agency's revision of its proposed rule to standardize vehicle identification numbers (VINs). The revision calls for a more rigid VIN format in order to reduce errors in transcribing the numbers (See *Status Report*, Vol. 13, No. 16, Nov. 17, 1978.) The Institute urged that the final rule should "in no way facilitate" the dropping of the "check" digit by persons recording the VINs. "To avoid confusion and errors it is important that all users of VINs always record the check digit in all manual operations," the Institute told NHTSA. "Consequently the Institute strongly urges that no methods of highlighting the check digit, such as hyphens, underlining, or other means, be permitted." IIHS also expressed support for a NHTSA proposal to allow voluntary compliance with the revised VIN rule before Sept. 1, 1980, the date the proposed VIN rule is scheduled to take effect.

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Status Report

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