insurance institute for highway safety

the highway loss reduction

Status Report

Vol. 15, No. 1 January 11, 1980

Stockman Insists on Manual Belts

Amendment May Threaten Automatic Protection

As the capital awaited the return of Congress to session late this month, a surprise amendment voted by the House in a pre-holiday adjournment rush has emerged as a possible major step backward in the long struggle to require automatic crash protection for vehicle occupants.

Camouflaged as a compromise "consumer choice" plan, the amendment to the National Highway Traffic Safety Administration (NHTSA) funding authorization introduced by Rep. David Stockman (R.-Mich.) is now seen by some close to the issue as a potentially damaging setback to the scheduled introduction of air bags and automatic belts.

There were widely divergent views on the significance of the Stockman amendment following the House vote.

Put in the best possible light it was seen as "a symbolic amendment with no real or direct impact on the Department of Transportation's passive restraint standard," as Rep. James H. Scheuer (D.-N.J.), chairman of the House Subcommittee on Consumer Protection and Finance, characterized it on the House floor when he accepted it without a fight. Scheuer was to have led the coalition of House members opposed to attempts by Stockman and a Michigan Democrat, Rep. John Dingell, to weaken the Department of Transportation (DOT) standard. Similarly, NHTSA officials were quoted as terming the Stockman move as a "nuisance amendment" with no real significance, since another amendment attached to the same authorizations bill limits its life to only fiscal year 1980. The automatic restraints rule does not begin to come into effect until the fall of 1981, with the introduction of 1982 models.

VOTE IS A DAMAGING PRECEDENT

But at worst, the Stockman amendment was being viewed both by Capitol Hill and NHTSA staffers as potentially a major setback because it put the House on record with an overwhelming record vote – 320 to 73 – that may be widely interpreted as an anti-air bag vote, thus setting the stage for more restrictive actions to come. Buoyed by the success of his "compromise," Stockman already has indicated plans to introduce his amendment (or some other anti-air bag language) as a separate piece of legislation in the new session of Congress. And there is little doubt that Stockman, Dingell, or other like-minded members will attempt similar amendments to any DOT funding bills that may reach the House floor before the DOT automatic restraint standard takes effect.

Asked by *Status Report* to estimate how many highway crash deaths and injuries would result per year if the Stockman amendment eventually supplants the present DOT passive restraint standard, an aide to the congressman said that the "level of assurance associated with such an estimate wouldn't justify our

(Cont'd on page 2)

Amendment May Threaten Automatic Protection *(Cont'd from page 1)*

doing it." But he added, "In large measure this is a political rather than a substantive matter." He said that a "majority" of domestic auto makers support the amendment – foreign companies "don't seem to care one way or the other" – and stressed that the amendment's "purpose is to eliminate the mandatory nature of DOT's standard."

The Stockman amendment bars any of NHTSA's authorized funds from being used "to enforce or otherwise administer" any restraint standard unless the standard permits the "purchaser" the option of a manual three-point seat belt. Many Congressmen may have been misled in believing that this was a guaranteed consumer choice among air bags, automatic belts, and manual belts. Indeed, that impression may have been encouraged by Stockman's floor statement: "This is a compromise solution that is designed to mandate the introduction of these things into the market, mandate the offering of passive restraints on every car that is sold by any manufacturer in the U.S. market, but give the consumer the choice of which system he will actually choose to have on his car."

However, a close examination of the amendment (see box) fails to substantiate this view. There is no specific mention of automatic (passive) restraints, let alone a requirement that both air bags and automatic belts be available. The only specific is that the currently required manual belts be available for a new-car "purchaser" who does not want whatever passive restraint system – bags or automatic belts – the manufacturers otherwise would provide on the car. A member of Stockman's staff later confirmed that the amendment "was not intended" to provide consumers a three-way choice among air bags, automatic belts, and active belts.

(Cont'd on page 3)

The Stockman Amendment

WHAT IT SAYS . . .	. . . AND WHAT IT WOULD MEAN
None of the funds authorized to be appropriated under this Act for the purpose of carrying out the National Traffic and Motor Vehicle Safety Act of 1966 . . .	***DOT may use no funds . . .***
. . . may be used by the Secretary of Transportation to enforce or otherwise administer any standard or regulation which requires any passenger car to be equipped with an occupant restraint system . . .	***. . . to enforce its automatic restraint standard . . .***
. . . unless such standard or regulation also permits the purchaser of a passenger car to select any occupant restraint system which, if installed in the passenger car purchased by such purchaser would comply with the requirements of Federal Motor Vehicle Safety Standard Number 208 (49 Code of Federal Regulations 571.208), relating to the installation of active seat-belt systems, as in effect at the end of June 29, 1977.	***. . . unless the standard is amended to allow new-car purchasers who don't want automatic restraints to order manual seat belts instead.***
. . . For the purpose of this section, the term "purchaser" includes a retail dealer purchasing a new passenger car for resale.	***. . . "Purchasers" include new car dealers.***

(The amendment would **not** *provide a new-car purchaser a choice between air bags, automatic belts, and manual belts – only between active belts and whatever automatic restraints a manufacturer otherwise chose to put in the car. For details see accompanying story.)*

On further examination the surprise amendment has another feature further limiting choice for the individual motorist. It closes with the statement: "For the purposes of this section, the term 'purchaser' includes a retail dealer purchasing a new passenger car for resale." This loophole permits the auto dealer to make the choice of restraint system when he orders cars from the manufacturer for his stock.

In today's marketing system, the majority of cars are ordered by dealers in wholesale lots, and relatively few are bought by consumers on special order. Dealers have shown themselves in the past generally to be indifferent or hostile to cars with air bag-type automatic restraints, and could not be expected to order them in any appreciable quantities. For instance, when General Motors announced plans for 100,000 air bag-equipped cars on an optional basis in the 1974-1976 model years, there was a noticeable lack of information and interest on the part of the auto salesman. (See *Status Report*, Vol. 11, No. 18, Nov. 30, 1976.) The program was cut off with only about 10,000 air bag-equipped cars sold.

EFFECT LIMITED TO ONE YEAR

As originally conceived, the Stockman amendment would have directly impinged on DOT's schedule for introducing automatic restraints. The original House authorizations bill (H.R. 2585) was drawn to a two-year period, fiscal years 1980 and 1981, which would have carried its restrictions on automatic restraint programs past Sept. 1, 1981, when they first must appear in some new cars. However, Scheuer succesfully pushed for an amendment limiting the authorization to only fiscal year 1980.

Michigan's Dingell had earlier succeeded in attaching an anti-air bag amendment to the 1980 NHTSA appropriations bill (see *Status Report*, Vol. 14, No. 15, Oct. 9, 1979), and it too will have lost its effect before the first automatic restraints are required.

When Congress returns to work about January 22, the House-approved authorizations bill and a Senate version approved last summer will go to a House-Senate conference committee to reconcile the differences. Key differences include the fact that the Senate bill carries an amendment sponsored by Majority Leader Robert Byrd that would require NHTSA to reduce the crash-test speed that bumpers must meet from 5 mph

(Cont'd on page 4)

Some Slips In The Press

Not only many Congressmen, but also some news reporters, apparently were misled to think that the Stockman amendment would offer a clear "consumer's choice" between air bags, automatic belts, and manual belts.

The Associated Press, for example, distributed a news report on the day of the House vote, saying: "The House voted today to require automobile makers to offer car buyers a choice between air bags and seat belts, beginning with 1982-model vehicles."

On December 28, the *Detroit News* in an editorial labeled "Stockman's Unbetter Idea" commented: "Thanks to Rep. Dave Stockman, (D.-Mich.), the buyer must be given the choice of either front-seat belts that do up automatically when the doors close, or air bags that inflate if the car crashes."

These reports were wrong. The Stockman amendment in reality offers a new-car "purchaser" only a choice between automatic and manual restraints. The choice of which automatic restraint a purchaser would be offered would, in effect, remain with the car manufacturer.

Amendment May Threaten Automatic Protection *(Cont'd from page 3)*

to 2.5 mph. (See *Status Report*, Vol. 14, No. 11, July 13, 1979.) The House bill carries the Stockman amendment. And the Senate bill covers a three-year period, while the House version is for only one year.

Observers see a number of possible outcomes in the conference committee:

- Senate conferees may accept the Stockman anti-air bag amendment in return for House acceptance of the Byrd anti-bumper standard amendment.

- There may be modifications in either or both the Senate and House bills to reach a consensus.

- The conferees may be unable to agree and fail to report out a joint bill. In such case the original bills would die and new measures would be introduced in each house, starting the whole process over.

House Votes For Legislative Veto Power

While most attention was focused on other aspects of the authorizations bill, the House voted without debate for an amendment that could enable a one-house legislative veto of any "rules or regulations" issued by the National Highway Traffic Safety Administration (NHTSA).

The amendment, introduced by Rep. Elliott H. Levitas (D.-Ga.), would extend legislative veto provisions similar to those previously applied in the areas of occupant restraints and school buses to the full range of subjects covered by NHTSA standards. If agreed to by the Senate, no NHTSA motor vehicle safety standard would become final until at least 60 days had been allowed for the Congress to act, and in some cases 90 days.

Adopted without a recorded vote, the amendment provides that a NHTSA rule can be vetoed by passage of a concurrent resolution in both houses, or can be vetoed if within 60 days one house passes such a concurrent resolution and that resolution is not rejected by the other house within the next 30 days.

"We should not leave such decisions to unelected bureaucrats any more than we allowed the seat belt standards to be finalized without Congressional review," Levitas told the House.

Proposals such as the Levitas amendment have been criticized in the past as illegal interference with the President's executive powers and, if the amendment survives the House-Senate conference process, it may be challenged in the courts as unconstitutional.

Safety Belt Comfort And Convenience Rule Proposed

By making seat belts easier to put on and more comfortable to use, the National Highway Traffic Safety Administration (NHTSA) expects to raise the level of safety belt use in vehicles.

In a notice of proposed rulemaking, NHTSA has outlined measures to reduce seat belt discomfort and inconvenience, which the agency says are cited by many people as their primary reasons for not wearing safety belts. (See *Status Report*, Vol. 14, No. 1, Jan. 9, 1979.) Although some critics have claimed

that rulemaking in those areas would not be cost beneficial, NHTSA predicted the current 14 percent belt use rate could be boosted to 22 percent if new rules were enacted.

The proposed rulemaking would cover both automatic and manual lap belts, but not manual combination lap and shoulder belts in the front seating positions. It's expected those three-point systems will be phased out with the gradual introduction of automatic restraint systems. Since automatic belts are expected to be a primary mode adopted by car makers for complying with NHTSA's automatic restraint rule (FMVSS 208), "it is imperative that the automatic belts be comfortable so they will be acceptable to the public," NHTSA said in its rulemaking notice.

Under the proposed rules, these are among the problem areas that would be addressed:

- Improper fit would be alleviated by requiring automatic torso belt webbing to cross the shoulder and chest about midway between the breasts. This would prevent the belt webbing from hitting the neck and face and shoulder tip. Chest discomfort, frequently cited by women, would be eased by limiting contact pressure to 0.7 pounds.

- Excessive tightening of lap belts caused by automatic locking retractors would be eliminated by banning the use of this type of retractor system in the front seat positions and replacing it with emergency locking retractors with manual locking devices. (The manual locking devices would permit the installation of child restraint systems in the front seat position.)

- Simplicity of entry and exit from cars equipped with automatic seat belts would be addressed, together with motorized track systems for automatic belts.

- To eliminate the groping search for hidden belts, the proposed rules would also stipulate that belts be accessible and convenient to use, both in front and rear seating positions.

The proposed rule is tentatively scheduled to go into effect with the 1982 model year and comments should be received by April 1, 1980, in the Docket Section, National Highway Traffic Safety Administration, Room 5108, 400 Seventh St., S. W., Washington, D. C. 20590. Refer to Docket No. 74-14, Notice 17.

Infant Crash Death Rate Found Disproportionately High

Maryland infants in motor vehicles have a crash death rate more than six times higher than children aged 1 to 14 years, a Maryland study has found. Stressing the need for increased use of infant and child restraints, the study reported that of the child motor vehicle occupants killed in the state over a five-year period, almost all were unrestrained.

The study's authors, Susan P. Baker of the Johns Hopkins University faculty and Jerome J. Karwacki, Jr. of the University of Maryland School of Medicine, investigated crash deaths from 1973 to 1977 in Maryland of motor vehicle occupants below the age of 15. Their findings supported an earlier study by Baker that revealed an "extremely high" national death rate for infant riders compared to older children (see *Status Report*, Vol 14, No. 5, March 19, 1979).

The Maryland study, which was supported by the Insurance Institute for Highway Safety, reported that the death rate per 1,000 occupants in crashes was 6.4 for children less than a year old, compared to 1.0 for children aged 1 to 14 years. Although children less than a year old comprised just 2 percent of the total number of children below the age of 15 involved in crashes, they totaled 15 percent of the deaths. Of the 89 child occupants killed over the 5 year period, 38 – 43 percent – were less than 5 years old.

(Cont'd on page 6)

Infant Crash Death Rate Found Disproportionately High *(Cont'd from page 5)*

"The protective value of seat belts and child restraints... is indicated here by the rarity of their use among fatally injured children," the researchers noted. "Only 3 percent of the children killed were restrained with seat belts or child restraints appropriate for use in vehicles. This is substantially less than the 7 percent observed use by child passengers under 10 years old in shopping and recreational areas in Maryland, Virginia, and Massachusetts."

ON-LAP TRAVEL INDICATED

At least eight of the children killed reportedly had been traveling on someone's lap. Their deaths "grimly illustrate the fact that children on laps cannot be adequately restrained and, moreover, may be crushed by the weight of those holding them," the study commented.

At least 66 of the children killed – 74 percent – were found to have sustained serious head injuries. These were most common among children less than two years old. The researchers noted that anatomical characteristics of very young children make them especially susceptible to serious head injuries, which may help explain their relatively high death rate.

The study emphasized that a mix of strategies must be employed to improve child passenger protection. It said these should include strengthened educational and legislative efforts to increase child restraint use, as well as the further development and use of automatic crash protection, including air bags and padded instrument panels.

Copies of the study, "Children in Motor Vehicles: Never Too Young to Die," by Jerome J. Karwacki, Jr., and Susan P. Baker, May 1979, may be obtained from Susan P. Baker, MPH, 111 Penn St., Baltimore, Md. 21201.

IIHS Hits FHWA 'Foot-Dragging' On Safety Policy

The Federal Highway Administration (FHWA) should stop its "foot-dragging" and propose specific plans for accelerating safety improvements on federal-aid highways, the Insurance Institute for Highway Safety has told the agency.

William Haddon, Jr., M.D., Institute president, warned in a letter responding to an FHWA request for comments that further delays will be "measured in dead bodies, crippled lives, and in unused, and hence wasted, construction resources."

The text of the Institute's comments follows:

> Gentlemen:
>
> "It is essential that FHWA provide national leadership in ensuring that the latest safety principles are incorporated in the design and construction of major Federal-aid highways."
>
> So begins the agency's request for comments "on the development of a policy for accelerating safety upgrading on Federal-aid highways" – a notice that represents not an assertion of leadership, but just another instance of the kind of foot-dragging that has been the hallmark of FHWA's "development" to date of a national road safety policy.
>
> On the basis of FHWA's recent past promises, this notice was expected to break new ground. Instead, it has turned out to be nothing more than a rehash of some basic questions to which the agency already should know the answers. If nothing else, this notice ensures that FHWA will take no meaningful action to "accelerate safety upgrading on Federal-aid highways" for many months – perhaps years – to come.

In this the agency is being faithful not to the interests of the public, but to its own recent history of foot-dragging. Some highlights:

Two years ago, the agency created a Safety Review Task Force to examine and evaluate the safety levels of both recently-completed Federal-aid highway projects and, in addition, safety upgrading on older projects. Although the Federal-aid highway program has been in operation for decades, and, its tremendous impact on human life and health well understood at least since the 1960s, this was the first review effort of its kind.

The Task Force's report was published in December 1978. It embodied a thorough and revealing review of such projects, individually and generally. It concluded with a set of recommendations for federal leadership action, a key one of which urged that FHWA "take the initiative in accelerating the safety upgrading of all Federal-aid systems."

In the June 1979 issue of Traffic Safety, the senior FHWA official who chaired the Task Force wrote that the agency had "set a goal of initiating all actions in response to the report recommendations by Oct. 1, 1979.... Our long range goal is to cut the current national fatality rate in half by providing the safest and most forgiving highway facilities possible."

It was expected that the agency would shortly act on the recommendations by issuing proposed rules and criteria. Instead, a Safety Review Implementation Task Force was created. In place of action, this Task Force initiated a further review – both of the earlier report, and of subsequently submitted recommendations from FHWA field personnel. In a document not available to the public until October 1979, but dated July, the Task Force dealt with the recommendation for FHWA "initiative in accelerating the safety upgrading" of all Federal-aid roads. It raised six "questions" on which it advised the agency to seek outside advice through the Federal Register. These six questions were nothing more than a rephrasing of what the December 1978 review said *FHWA should do*. It is these questions that were published in the October 25, 1979, "request for public comments".

That is the present status of FHWA's assertion of "leadership" in bringing higher levels of safety to non-Interstate Federal-aid highways.

The time is now long overdue for FHWA to assert real leadership and begin a meaningful program that will accelerate the upgrading of Federal-aid highways. Seeking further comments on obvious questions that FHWA itself should have long ago answered will only serve to delay the process even further.

FHWA should publish specific *proposals* for the following areas and publish these for comment:

First, the FHWA should propose specific guidelines and procedures to be used to identify locations on Federal-aid highways that are hazardous and need upgrading.

Second, the FHWA should propose procedures for establishing priorities among the identified locations to determine those to be upgraded first. Information such as that contained in the Institute's "Priorities for Roadside Hazard Modification" provides one such basis for beginning to focus on the types of locations with higher priorities.

Third, FHWA should propose specific and adequate funding levels to ensure that the program moves forward to reduce the thousands of unnecessary deaths and injuries occurring each year because of hazardous locations on Federal-aid highways. One possibility that the FHWA should carefully consider is incorporating a hazardous location improvement program into the existing "Resurfacing, Restoration, and Rehabilitation" (3-R) program. Since it is anticipated that this current program will reach approximately 40 percent of the rural non-interstate highway system within the next ten years, it is an obvious vehicle to reach a major part of the network in a relatively short period of time.

At this time it is inappropriate for FHWA to attempt to specify either minimum design or performance standards for upgrading hazardous locations. The very nature of the Federal-aid highway system with its considerable variations in the types of locations and hazards encountered would probably guarantee that

(Cont'd on page 8)

IIHS Urges 'Specific Proposals' On FHWA Safety Policy *(Cont'd from page 7)*

any such standards would either have to be unreasonably weak or could not be achieved within reasonable cost at all hazardous locations. It should be more than sufficient to require that where appropriate the better, accepted practices used on interstate highways in recent years be adopted for such improvements.

As a result of the expected completion of the interstate highway system in the next few years, substantial road construction and engineering resources will become available. Unless new programs are undertaken these resources will be under-utilized and wasted. It is imperative that FHWA move forward vigorously to take advantage of this capability, which can easily switch from constructing new highways to providing safety improvements on existing roads.

The agency's overall record of timely concern for the safety performance of Federal-aid highways generally has been dismal. The "Yellow Book" was needed for years before it finally was issued in 1970. The agency had to be taken to court before it would impose standards to protect the public from the lethal hazards with which Federal-aid highway construction zones were routinely strewn. And, most recently, FHWA came uncomfortably close to seriously degrading the safety criteria applied to projects under the 3-R program.

The foot-dragging associated with the setting of rules and criteria for improving the safety performance of all Federal-aid highways is more of the same. It is a case not just of wasteful running-in-place by government, but of running-in-place whose results will also be measured in dead bodies, crippled lives, and in unused, and hence wasted, construction resources. FHWA should immediately publish specific proposals for its policy for "accelerating safety upgrading on Federal-aid highways." Then and only then will the agency be doing its job.

Sincerely,

William Haddon, Jr., M. D.
President

Traffic Schools: A Refuge For Repeat Offenders?

Subsequent driving records have not improved for California motorists assigned to traffic school after convictions for driving offenses, a study by the state Department of Motor Vehicles has concluded.

One problem, the researchers suggested, is that the court-affiliated traffic violator schools may have become a refuge for repeat offenders who use school attendance to wipe their offenses from the records.

The study, performed to evaluate the department's accreditation program for the traffic schools, dealt with 14,278 convicted traffic violators in nonalcohol-related cases. Half were assigned to traffic schools and the other half had the school requirement waived. The driving records for the next six months of those assigned to schools were compared with the records of those granted waivers. No significant difference was found between the two groups in the number of crashes in which they were involved or the number of traffic tickets received.

In California, more than 300,000 drivers are estimated to be assigned to traffic schools each year. By attending they usually can have their traffic convictions dismissed. This not only voids any fine, but also prevents accumulation of points on their driving records that could lead to suspension of their licenses or increases in their insurance rates.

The Department of Motor Vehicles admitted that records of the students attending the traffic schools are inadequate to determine how many repeat offenders are enrolled, but a department spokesman ex-

plained that it is well understood that many people use the schools to avoid paying the price for repeated violations.

"When a driver receives a dismissal for attending traffic school, he is, in a sense, being rewarded for attending traffic school," the research report commented. "There is, of course, nothing wrong with applying positive reinforcement to promote safe driving. However, from a behavioral analysis perspective, what we want to reward is safer and more lawful driving – not merely attending a traffic school. Any reward system that is not contingent upon maintaining an improved record is difficult to defend on reinforcement theory grounds, and could be counterproductive."

The researchers recommended that legislation be enacted to control court dismissal of convictions for offenders attending traffic school. One suggestion was that all traffic school assignments be defined as reportable traffic convictions that remain on a driver's record. Another would require that all school referrals be noted on the driver's record, but would permit one such conviction in a three-year period to be "masked" and not counted against the driver. Yet another suggestion was that a conviction be "masked" on the record only if the driver subsequently maintains a clean driving record.

The California study is titled "The Effectiveness of Accredited Traffic Violator Schools in Reducing Accidents and Violations," and was produced by the Research and Development Section of the California Department of Motor Vehicles, 2415 First Ave., P. O. Box 1828, Sacramento, California 95809.

New Pavement Skid Tests Rejected

Skid resistance tests for newly constructed and resurfaced roads before they are opened to the public are impractical, the Federal Highway Administration (FHWA) has said in a letter to the National Transportation Safety Board.

Following the investigation of an Oklahoma crash during the summer of 1977, the safety board had recommended that FHWA "expeditiously" develop procedures to determine the skid resistance of new pavement before new sections are opened for use. While FHWA said it agrees with the "spirit" of the recommendation, it complained that the problems of developing acceptance test procedures for contractors are so complex that it could not define a "single set of practical construction specifications" to meet a universal skid resistance test.

Technically, the agency does require the states to "routinely" test federal-aid highways with speed limits over 40 mph, for specified minimum skid resistance levels as a requisite for obtaining federal funds, FHWA representatives told *Status Report*. In reality, the agency's program represents only a goal for most states, with only a few small states actually achieving full compliance.

FEW SITES ARE TESTED

While every state except Alaska is in the process of conducting a skid test "inventory" of its roads to determine what sites need to be improved, there are not enough dollars – and there is too much pavement – to do the job right, the officials said. As something of a compromise, the states automatically test sites that have experienced more than their share of wet-weather crashes, to determine whether the pavement needs to be treated.

Skid testing is more of an art than a science, the officials told *Status Report*. They said there is no new pavement test requirement partly because FHWA feels its design requirements for pavement materials automatically provide high skid resistance levels and partly because of difficulty in developing acceptance test procedures for contractors.

(Cont'd on page 10)

New Pavement Skid Tests Rejected *(Cont'd from page 9)*

In the Oklahoma crash that sparked the safety board's investigation, the road had just been resurfaced with materials that FHWA would not have found acceptable for pavement construction. That particular project had been classified as routine maintenance, the officials indicated, making it ineligible for federal assistance. The state used a pavement mixture that was of poor quality, the officials said, resulting in a road surface that was too slick. However, they indicated that most states routinely resurface pavement with FHWA construction-grade materials.

In its letter to the safety board, FHWA said it is modifying its program to reduce wet weather skid crashes by:

- Updating their "skid accident reduction program" to reflect latest technology.
- Requiring the states to evaluate pavement design and surface treatments for skid resistance.
- Establishing a closer working relationship concerning skid reduction between the federal agency and state and local governments.

Safety Standards To Cover Light Trucks & Vans

Safety features such as energy-absorbing steering assemblies and interior padding, long required in passenger cars, will be standard equipment in light trucks, buses, and multipurpose vehicles (such as vans) under 10,000 pounds, beginning Sept. 1, 1981, the National Highway Traffic Safety Administration (NHTSA) has ruled. As part of the package, the safety agency will also require the installation of combination lap and shoulder belts in some types of vans.

In a final rule extending federal requirements for these features to additional types of vehicles, however, the agency made no move to correct shortcomings of the standards that have been noted in the past. For example, the agency continued to postpone any improvement of a compliance test for energy-absorbing steering columns that critics say has discouraged the manufacture of steering columns that perform better in real-world crashes. And while the minimal interior protection requirements of FMVSS 201 are extended to the light trucks and vans, there is no initiative to upgrade the standard to require improved occupant protection.

NHTSA said the extension of the rules was in response to rapidly rising fatality rates among drivers and passengers in the heavier vehicles and had been petitioned by the Center for Auto Safety and the Insurance Institute for Highway Safety. (See *Status Report,* Vol. 13, No. 16, Nov. 17, 1978.)

COMPLIANCE TEST UPGRADE TO BE 'STUDIED'

The agency noted requests by the Center for Auto Safety and the Institute for new performance test requirements for energy-absorbing steering assemblies that more closely reflect real-world crashes, but argued for the earliest possible extension of the present standard's protection while the agency continues its research into ways to improve the standard. At issue is the present laboratory compliance test. Research on the performance of steering columns has shown that designs which do well in the tests do not provide as good protection in real-world crashes as alternative designs which are not widely used because they do not perform well in the tests (see *Status Report*, Vol. 14, No. 15, Oct. 9, 1979).

NHTSA said some preliminary tests have been done and that it is gathering crash data to survey the extent of the problem. No target date has been set for completion of the studies, a spokesman for the Office of Vehicle Safety said.

Specifically, the agency amended:

– Federal Motor Vehicle Safety Standard (FMVSS) 201, Occupant Protection in Interior Impact, to require the use of energy-absorbing materials on interior components such as the instrument panel, armrests, and seat backs, in light trucks, buses, and multipurpose vehicles under 10,000 pounds.

– FMVSS 208, Occupant Crash Protection, to require combination lap and shoulder belts in all forward control vehicles. This applies to vehicles, such as the Volkswagen Microbus, where more than half the engine is mounted behind the base of the windshield and whose steering wheel hub is in the front quarter of the vehicle's length.

– FMVSS 203, Impact Protection for the Driver from the Steering Control System, so that light trucks, buses, and vans under 10,000 pounds must meet the current laboratory compliance test. The rule is intended to limit the amount of force that may be exerted on a driver's chest by the steering wheel in a frontal crash.

– FMVSS 204, Steering Control Rearward Displacement, which limits the distance a steering wheel can move backwards during a frontal crash, to extend its coverage to trucks, buses, and vans with an unloaded vehicle weight of 4,000 pounds or less, instead of a loaded weight of 10,000 pounds as originally proposed. NHTSA estimates that most (75 percent) of the vehicles sold will be covered by the standard. The agency said it will continue to study how to handle the special enforcement problems posed by second-stage manufacturers who mount such things as cranes and winches on truck beds for use as wreckers or other purposes.

Step vans also were exempted from meeting standards 203 and 204, the agency said, since "the current energy-absorbing designs would offer little, if any, protection" to drivers of step vans "because of their unique driver/steering column configuration."

Correction

The difference between expected and actual motorcycle fatalities following helmet law repeal in Maine as shown in a table in Status Report, Vol. 14, No. 18, Dec. 21, 1979, should have read -60.9 percent.

UPDATE . . .

VIN STANDARD UPHELD: Federal regulations standardizing vehicle identification numbers (VINs) are legal, the U.S. Court of Appeals for the Fourth Circuit has ruled. (See *Status Report*, Vol. 14, No. 6, April 9, 1979.) The Vehicle Equipment Safety Commission and the Maryland Motor Vehicle Administration both had objected to the amended FMVSS 115 adopted by NHTSA, and had filed petitions for judicial review. With their arguments rejected, the requirement for a 17-character standardized VIN will take effect for all passenger cars, multipurpose vehicles (under 10,000 pounds), and light trucks manufactured after Sept. 1, 1980. The petitioners had argued that NHTSA had exceeded its authority in rulemaking, which must "meet the need for motor vehicle safety." However, the court held that VINs are important to safety in speeding crash reporting and analysis and in reducing errors in recall campaigns.

CHILD DUMMIES SPECIFIED: The National Highway Traffic Safety Administration has issued specifications for dummies to be used in the compliance testing of child and infant restraints under recent revisions of Federal Motor Vehicle Safety Standard 213 (see *Status Report*, Vol. 14, No. 18, Dec. 21, 1979). The revised standard calls for a dummy, representing a three-year-old child, to be used in testing child restraints and for one, representing a six-month-old child, to be used in testing infant restraints in simulated frontal crashes up to 30 mph.

On The Inside

Vol. 15, No. 1, Jan. 11, 1980

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Status Report

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ISSN 0018-988X