INSURANCE INSTITUTE
FOR HIGHWAY SAFETY

October 19, 2006

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

Federal Motor Vehicle Safety Standard No. 126,
Electronic Stability Control Systems; Notice of Proposed Rulemaking
Docket No. NHTSA-2006-25801

Dear Ms. Nason:

The National Highway Traffic Safety Administration (NHTSA) has requested comments on a new federal motor vehicle safety standard to require the installation of electronic stability control (ESC) systems on all passenger vehicles. The Insurance Institute for Highway Safety (IIHS) supports the proposed standard because our research shows that these systems are effective in reducing crashes, especially fatal ones. However, we believe the proposed implementation schedule should be shortened.

Research conducted by IIHS has shown that ESC reduces the risk of all single-vehicle crashes by more than 40 percent -- fatal ones by 56 percent. IIHS estimates that if all vehicles were equipped with ESC, as many as 10,000 fatal crashes could be avoided each year (Farmer, 2004, in press). The results of IIHS studies showing significant reductions in serious crash risk are also reflected in some insurance losses. According to a study by the Highway Loss Data Institute (2006), an affiliate of IIHS, insurance losses under collision coverage are about 15 percent lower for vehicles with ESC than for predecessor models without it. However, ESC does not have much effect on property damage liability claims or the frequency of injury claims. These findings track police-reported crashes, which show little effect of ESC on the risk of low-severity multiple-vehicle crashes. The vehicles in the IIHS and HLDI studies were equipped with a variety of ESC systems, designed to maintain the stability of the vehicle in situations involving oversteer (the rear end of the vehicle begins to slide or spin out) and understeer (the front of the vehicle continues to move forward when the driver steers the vehicle to move right or left). The IIHS and HLDI studies have demonstrated the effectiveness of those ESC systems on a wide range of passenger vehicles, so IIHS supports the proposal to require ESC across the passenger vehicle fleet.

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The proposal would require all ESC systems to have certain specified components or capabilities (e.g., ability to apply brakes at all four wheels) that are common to systems currently in the fleet. Vehicles also will be required to meet performance requirements, which emphasize preventing oversteer, in a dynamic test. IIHS agrees that both aspects are essential to ensure that all ESC systems adopted by manufacturers will be as effective as those already in use. Because the performance test proposed by NHTSA does not fully address understeer, we believe it is important that the agency monitor the performance of vehicles equipped with ESC systems to ensure that they continue to be effective in the real world.

In addition, we support the use of an on/off switch because there are situations (e.g., initiated movement on deep snow) in which the system would need to be disabled. And we strongly agree that the default mode for the on/off switch should be "on" each time the vehicle is started.

Because manufacturers are rapidly moving to add ESC to their vehicles, the proposed implementation schedule is too long. NHTSA notes that ESC already is installed in 29 percent of 2006 light vehicles sold in the United States. Yet the agency only proposes that manufacturers achieve a 30 percent implementation rate by September 1, 2008. NHTSA should re-evaluate the schedule and establish one that will more quickly implement this life-saving technology in all passenger vehicles.

Sincerely,

Adrian K. Lund, Ph.D.
President

cc: Docket Clerk, Docket No. NHTSA-2006-25801

References

Farmer, C.M. 2004. Effect of electronic stability control on automobile crash risk. *Traffic Injury Prevention* 5:317-25.

Farmer, C.M. 2006. Effects of electronic stability control: an update. *Traffic Injury Prevention*, in press.

Highway Loss Data Institute. 2006. Electronic stability control. *HLDI Bulletin* Vol. 23, No. 1. Arlington, VA.