the highway
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STATUS REPORT

INSURANCE INSTITUTE
for Highway Safety

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Incentive Scheme Favors Small States

The Department of Transportation's proposed scheme for awarding incentive funds to states that make "the most significant reduction" in highway death rates would favor small states over big ones.

The formula would reward states with erratic shifts in their fatality experience and disfavor those with gradual but steady fatality decreases. (See figures, page 2.)

DOT's proposal (Docket 74-22) was recently published in the *Federal Register,* with an invitation for public comment. Under the proposal a state eligible for an incentive grant in a particular year would be required to have:

- a lower fatality rate per 100 million vehicle miles than its rate for the preceding four years;
- no increase in fatalities that exceeds in percentage any national increase; and either:
- a fatality rate not greater than one-half the national fatality rate for such year; or
- a fatality rate reduction at least 10 per cent greater than any national fatality rate reduction.

Any state that satisfies the criteria would be eligible for a grant equal to 25 per cent of the federal highway safety funds given to it for that same year. States that satisfy the criteria would qualify to receive grants beginning Oct. 1, 1974. If sufficient funds are not available for all eligible states, the states would be ranked in order by fatality rates and grants would be made accordingly.

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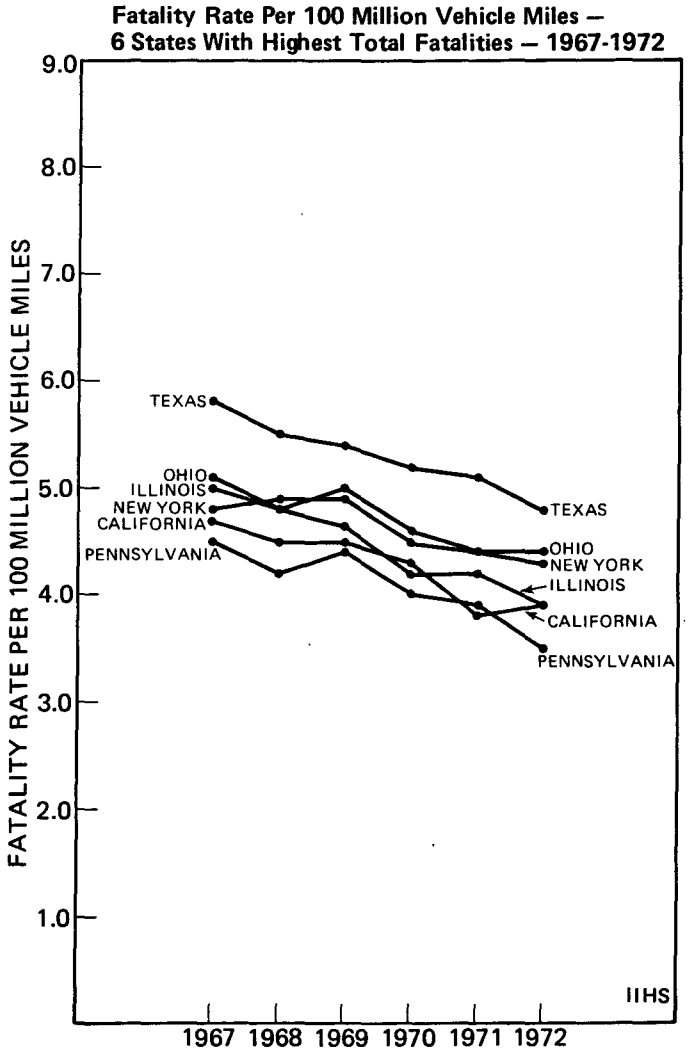
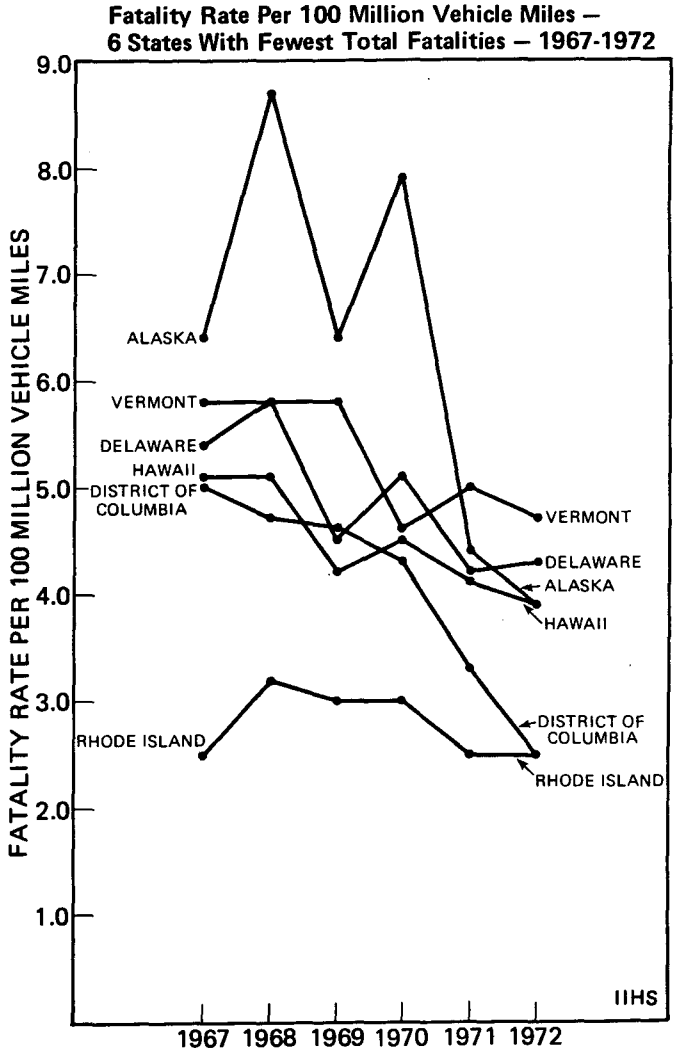
The Insurance Institute for Highway Safety is an independent, nonprofit, scientific and educational organization. It is dedicated to reducing the losses—deaths, injuries and property damage—resulting from crashes on the nation's highways. The Institute is supported by the American Insurance Association, the National Association of Automotive Mutual Insurance Companies, the National Association of Independent Insurers

Because of the statistically expected and well documented greater fluctuations in fatality rates of states with small numbers of fatalities, these states should qualify more frequently than larger states with greater numbers of fatalities annually. The five states ranked as most eligible for 1974 grants each had less than 200 fatalities in the 1972 base year.

A state such as Texas which experienced a steady decline in fatality rates from 1969 though 1972 would not have qualified in either of the years 1971 and 1972 under the proposed DOT criteria. On the other hand, a state such as Alaska that had a sharp increase in fatality rate from 1969 to 1970 would have qualified under the proposed DOT criteria in 1971 and 1972.

The fatality reduction incentive program was mandated by the Congress to encourage the states, by whatever means are found to be most effective, to reduce the highway death and injury toll. DOT developed the details of the program.





Belt Law, Si; Belt Use, No

Puerto Rico's much touted mandatory safety belt law has brought safety belt use there to 18 per cent, according to unpublished National Highway Traffic Safety Administration data. That use rate is about the same as has been observed elsewhere in the U.S. where no such law is in effect.

Studies conducted by the Insurance Institute for Highway Safety have found U.S driver belt use in pre-interlock cars ranging from 18 per cent to 25 per cent. (See *Status Report,* Vol. 9, No. 13, July 8, 1974.)

Status Report has learned that the Puerto Rico use rate in belt equipped vehicles was measured by roughly 10,000 observations made for the National Highway Traffic Safety Administration in May this year. The agency has made no public mention of its findings. On May 16, NHTSA awarded Puerto Rico almost $300,000 for enacting the belt law.

According to NHTSA, safety belt laws were introduced in 26 state legislatures this year. So far Puerto Rico is the only jurisdiction to enact such legislation. Awarding the grant to Puerto Rico, Safety Administrator James B. Gregory said, "We are confident that successful results from your program will encourage similar action on the part of other states and jurisdictions."

The 18 per cent use rate in Puerto Rico represents an increase from a five per cent front seat occupant use rate observed before the law was passed, according to an NHTSA official. He admitted that the use rate "isn't very high, but next to nothing it's something." The official told *Status Report* that currently the law is not being enforced because citizens have "made such a stink about it." He said the agency expects enforcement and belt use to increase once the law is amended to allow two warnings before a fine is required. The law has already been amended to exempt taxi cabs, he said.

Under similar laws, belt use in Australia is reported to be 75 per cent in metropolitan areas and 64 per cent in rural areas. (See *Status Report*, Vol. 7, No. 11, June 12, 1972.)

The U.S. Congress is considering legislation to cut off funds for the belt law incentive program. The program was mandated by the Highway Safety Act of 1973. (See *Status Report*, Vol. 9, No. 13, July 8, 1974.)

Congress May Mandate Passive Restraints

Sen. Warren G. Magnuson (D-Wash.), chairman of the Senate Committee on Commerce, has warned that Congress may legislate passive restraints if the National Highway Traffic Safety Administration doesn't move to implement its currently proposed standard. Magnuson's committee oversees federal vehicle safety efforts for the Senate.

Speaking in behalf of Magnuson, S. Lynn Sutcliffe, a Senate Commerce Committee counsel, said that the Senator had told him "that it's time we get on with the implementation of that [passive restraint] standard and if the National Highway Traffic Safety Administration can't or won't do it maybe we'll have to do it by legislation."

Sutcliffe related Magnuson's comment at a conference in San Francisco where he accepted, for the Senator, the National Motor Vehicle Safety Advisory Council's "Excalibur" auto safety award.

NHTSA May Drop 'No Damage' Test From Bumper Rule

In response to auto maker requests, the National Highway Traffic Safety Administration has proposed dropping the "no damage" requirement from its property damage bumper proposal. The agency also has proposed a one year delay in the effective date of the proposal, until the 1976 model year.

Although a no damage level of performance "can be attained," NHTSA said "the automobile industry may need more time in which to develop designs that will satisfy the requirement."

Under the agency's new proposal, auto makers would be permitted to use so-called soft face bumpers to meet both the proposed property damage bumper standard and the agency's current bumper standard (FMVSS 215), which prohibits damage only to certain "safety related" vehicle components in low speed crashes.

Citing Insurance Institute for Highway Safety research, NHTSA's new proposal denied auto maker requests to eliminate or modify the low-corner pendulum impact test, required by FMVSS 215 to take effect in the 1976 model year.

PROPERTY DAMAGE BUMPERS

In the Motor Vehicle Information and Cost Savings Act of 1972, Congress directed the Department of Transportation to issue bumper standards to reduce or eliminate property damage resulting from low speed collisions. In August, 1973, NHTSA first proposed a standard that would have prohibited essentially any damage to a car in five mile per hour front and rear barrier crashes, starting with 1975 model cars. With the 1976 models, a series of five mile per hour front and rear and three mile per hour corner pendulum impacts would have been added. (See *Status Report,* Vol. 8, No. 15, Aug. 1, 1973.)

The new NHTSA proposal would indefinitely drop the no damage requirement, and would delay the effective date of the proposed standard for one year, until the 1976 model year. The proposal would allow damage to any area "where contact is made" between the vehicle and the "barrier face or the impact ridge of the pendulum test device" during testing and "within one-half inch of those areas."

The agency said it may consider a possible upgrading of the performance requirements of the standard at a later date in the areas of "higher impact speeds and protection from all damage from the test impacts." In its August, 1973, property damage bumper proposal, NHTSA defined low speed impacts as those from 0 to 20 miles per hour.

SOFT FACE BUMPERS

The new NHTSA proposal would grant a General Motors request to allow use of so-called soft face bumpers to meet the agency's bumper tests. The agency explained that such bumpers are "constructed out of yielding materials that when impacted by another vehicle spread their force over a large area." NHTSA said the flexible components of the soft face system, except those contacted by the test devices, must restore to their original shape within one-half hour after impact.

NHTSA said that the current bumper systems used by manufacturers to meet FMVSS 215 have "added considerable weight" to cars and "have accounted for increased development, production and operating costs." The new soft face bumper system is "less hostile in impacts with other vehicles" and has a "higher potential for damage resistability in low speed collisions," NHTSA said. In addition, such systems are lighter than current bumpers and are "probably less costly," according to the agency.

CORNER IMPACTS

American Motors, Ford and General Motors had petitioned NHTSA to eliminate or modify the low-corner pendulum test impacts of FMVSS 215. The auto makers argued, among other things, that such impacts seldom occur. In denying the auto makers' requests, NHTSA said a study of unrepaired vehicle damage conducted by the Insurance Institute for Highway Safety had shown that "over 50 per cent" of such damage "was located at the vehicle corners." (See *Status Report*, Vol. 8, No. 17, Sept. 10, 1973.) The agency said a "significant portion" of corner damage occurs as a result of bumper override in low speed corner impacts. The low-corner impact test will promote bumper design to end overriding, NHTSA said. (In presenting the results of the Institute's low speed crash tests of 1974 model domestic cars, Dr. William Haddon, Jr., M.D., the Institute's president, reported that "some 1974 model cars are so designed that in our tests their bumpers actually promoted underride and override in jogging speed, 10 mile per hour, front-into-corner crashes, thus aggravating, by design, the damage and repair cost resulting from such commonplace crashes." See *Status Report*, Vol. 9, No. 2, Jan. 28, 1974.)

Comments on NHTSA's new bumper proposal, which appeared in the *Federal Register* of July 9, 1974, should be sent by Aug. 20, 1974, to: Dockets, 74-11, Notice 2 and 73-19, Notice 3, Docket Section, National Highway Traffic Safety Administration, 400 7th St., S. W., Washington, D. C. 20590.

Differences Between Size And Weight Effects Explored

Two key papers presented at the recent International Congress on Automotive Safety have indicated that the size-weight characteristics of the occupant's own car, rather than those of the car with which it collides, are the principal determinant of injury severity in two car crashes.

One paper, presented by National Highway Traffic Safety Administration official Donald F. Mela, found on the basis of analyses of actual New York State crash data that a driver's chance of serious injury "increased or decreased by about five per cent for each 100-pound decrease or increase in his car weight . . . ." However, it found that the driver's chance of serious injury decreased or increased by only 1.8 per cent "for each 100-pound increase or decrease in the weight of the other car in the collision."

The other paper, by researchers from the Insurance Institute for Highway Safety and the Center for the Environment and Man, Inc., suggested on the basis of analyses of North Carolina crash data, that the influence of the occupant's vehicle size on the severity of his crash injury in a two car crash be recognized by "a crashworthiness design concept for intervehicular crashes that regards increases in vehicle *size* as primarily *protective*, and increases in vehicle *weight* as primarily *hostile*." Such a concept, the paper said, indicates "the desirability of relatively sizeable but not heavy vehicles."

The International Congress on Automotive Safety, the third of its kind, was held this month in San Francisco under the auspices of the Department of Transportation's National Motor Vehicle Safety Advisory Council. One of the meeting's themes was, "Big Car-Small Car: Future Vehicle Mix and Automotive Safety."

In his paper, Mela warned that a shift in the United States car population "to one composed primarily of compact and sub compact cars could produce up to 25 per cent more serious and fatal injuries than would be suffered if there were no change in the weight distribution." But, he added, if "all the cars on the road now had the same weight, that weight could be about 200 pounds less than the current average without increase in the serious injury rate." The increased highway fatalities that would be produced by a predominantly small car population, Mela also said, could be partially offset by a reduction in maximum speeds and "more than offset" by a mandatory safety belt use law.

WEIGHT-SIZE RELATIONSHIPS

The paper by Brian O'Neill and William Haddon, Jr., of the Insurance Institute for Highway Safety, and Hans Joksch of the Center for the Environment and Man, Inc., pointed out that although many existing studies have documented that "the decreasing size of the cars in the vehicle population may tend to generate more severe and more frequent losses," they provide "no basis to separate the effects due to vehicle size differences and the effects due to mass differences." The authors therefore developed "some elementary theoretical relationships between car size, car weight and the severity of occupant crash injuries in car-to-car crashes," and applied these to the North Carolina crash data.

On the basis of those relationships, the authors suggested "the desirability of vehicle populations in which the range of vehicle weights is small. However, it appears that the size of the vehicle has much more influence on the likelihood of injuries to its occupants, the larger the vehicle the lower both the theoretical and actual occurrence of injury."

They concluded that if increases in vehicle size "can be obtained without substantial relative increases in [vehicle] weight, occupants could be afforded greater crash protection without adding to the kinetic energy that must be absorbed or dissipated in a crash . . . . There appears to be no evidence, and no theoretical reason to believe, that the size of a vehicle, unless associated with increased vehicle mass, produces any penalties to the occupants of other cars in intervehicular collisions.

"The results of this study, however, suggest that there are penalties (in terms of increased occurrence of occupant injuries associated with differences in vehicle mass) to the occupants of the lighter car and the penalties are, in general, greater than the benefits to the occupants of the heavier car."

Copies of "Relationships Between Car Size, Car Weight and Crash Injuries In Car-To-Car Crashes" by O'Neill, Joksch and Haddon are available by writing "Size-Weight," Insurance Institute for Highway Safety, Watergate Six Hundred, Washington, D.C. 20037. Proceedings of the conference are available from the Executive Secretariat, NHTSA, 400 7th St., S.W., Washington, D.C. 20590.

NHTSA Advocate Dead At 37

Lawrence R. Schneider, chief counsel of the National Highway Traffic Safety Administration, has died at the age of 37.

Mr. Schneider was regarded with great respect for his work in crafting strong and sometimes precedent setting legal foundations for NHTSA's most effective efforts in the areas of vehicle safety rulemaking and defect notification campaigns.

Mr. Schneider joined the U.S. Department of Transportation's legal staff servicing NHTSA's predecessor agency, the National Highway Safety Bureau, in 1968. He became NHTSA's chief counsel shortly after the agency was reorganized as a separate administration within the U.S. Department of Transportation.

Prior to joining DOT, Mr. Schneider was associated with a Washington law firm. Before that, he was a trial attorney with the U.S. Department of Justice. His undergraduate and graduate degrees were from Kenyon College, Western Reserve University and Georgetown University. He was a recipient of the NHTSA Administrator's Award (1971) and the DOT Secretary's Meritorious Achievement Award (1972).

Cost Savings Act Progress Surveyed

In October, 1972, the Motor Vehicle Information and Cost Savings Act was signed into law. The Act mandated that the Department of Transportation reduce economic losses resulting from low speed collisions; provide consumers with comparisons of the crashworthiness, damageability and repairability of different vehicles; establish state-run vehicle diagnostic inspection demonstration projects, and protect consumers from odometer tampering.

The following briefly describes the current status of DOT's efforts to implement the four sections of the Cost Savings Act:

PROPERTY DAMAGE BUMPER STANDARDS – TITLE I

In order "to reduce the economic loss resulting from damage to passenger motor vehicles" involved in crashes, Congress directed DOT to establish "bumper" standards "to reduce the extent of such economic loss."

In August, 1973, the National Highway Traffic Safety Administration first proposed rulemaking to establish a bumper standard, starting with 1975 model cars, that essentially would prohibit property damage in low speed collisions. After reviewing comments received in response to that proposal, NHTSA recently proposed an easing of the no damage requirement and a one year postponement of the effective date. (See story on page 4.)

In March of this year, Secretary of Transportation Claude S. Brinegar reported to the Congress that the NHTSA is conducting a benefit/cost analysis of the proposed property damage bumper system. Brinegar reported that the "preliminary results" of an analysis of systems meeting the current federal bumper standard (FMVSS 215) – prohibiting damage only to certain safety related vehicle components in low speed crashes – indicates that such systems are "yielding cost savings to the consumer in the form of reduced insurance premiums for collision coverage." He said, "Savings are also indicated in the absence of damage or reduced damage in many low-speed front and rear impacts. As property damage is reduced, there appears a corresponding reduction in the need for accident reports, police investigations and court litigations."

(A recent report by the Highway Loss Data Institute found that 1973 model cars, all of which had bumper systems designed to meet FMVSS 215, in comparison with 1972 models, which did not have to comply with FMVSS 215, have fewer collision claims. See *Status Report,* Vol. 9, No. 13, July 8, 1974.)

CONSUMER INFORMATION – TITLE II

The Congress directed DOT to prepare by October, 1973, a "comprehensive study and investigation" of methods for determining vehicle crashworthiness, damageability and repairability. By February, 1975, DOT was to issue a rule requiring automobile dealers to provide prospective customers with DOT prepared information on differences in insurance costs for different makes and models.

In September, 1973, NHTSA Administrator Dr. James B. Gregory told Congress, "Delays in the funding of the tasks prescribed will not permit meeting the stringent deadlines and schedule outlined in the Act." Subsequently, in February, 1974, NHTSA informed Congress that "only partial resolution" of the vehicle rating information "is feasible by 1975." The agency said that "comparative automobile ratings . . . limited to high volume models of one car class" will be available in late 1975.

To assist it in preparing the mandated consumer information, NHTSA has awarded the following six contracts:

- $336,280 to Dynamic Science Division of Ultrasystems, Inc. and $300,819 to Calspan Corp. to conduct crash testing of 1973 and 1974 model intermediate size cars. The cars will be subjected to 15 and 30 mile per hour frontal barrier crash tests, 20 mile per hour front into side and front into rear tests and 15 mile per hour rear moving barrier crash tests. Test dummies will be used to gather data on potential injury to human occupants. Information gathered in the crash tests will be used by other NHTSA contractors in developing a vehicle rating system. Both contracts are to be completed by Oct. 24, 1975.

- $886,270 to General Electric Company's Information Systems Programs to develop a system for rating a vehicle's damage susceptibility, crashworthiness and repairability. Among the data the rating system may utilize are engineering design and crash test reports, insurance claims and payment information, repair and maintenance records, and reports of real world crashes.

GE will also prepare a listing of vehicle parts that are "safety, operational, or cost critical to the use or repair of the motor vehicle" and conduct a feasibility study of mathematical modeling to evaluate vehicle damage susceptibility and crashworthiness.

In addition, GE is to compile a comparison of passenger car insurance rates by year, make and model that reflects the differences in costs due to vehicle characteristics, such as type of bumper and engine size, and owner/driver characteristics, such as age and sex.

State Farm Mutual Automobile Insurance Co. is working as an unpaid subcontractor to GE on the contract, which is to be completed by Dec. 7, 1975.

- $568,957 to Booz, Allen and Hamilton, Inc. to determine the most effective method of presenting the vehicle ratings to the public. The contractor will also determine the best way for automobile dealers to give prospective car purchasers information on differences in insurance cost for different makes and models based on difference in damage susceptibility and crashworthiness. The contractor has until May 30, 1976, to complete the study.

- $99,872 to the Center for the Environment and Man, Inc. and $95,710 to Arthur D. Little, Inc. to determine the economic, sociological, political and safety effects of alternative methods of providing consumers with vehicle rating information. The contractors will estimate potential changes in consumer purchase patterns due to the rating information and resulting changes in the mix of new cars on the road. Estimates will be prepared on how a change in the mix of cars may affect injuries, fatalities and property damage in vehicle crashes. The Center for the Environment and Man has until Feb. 6, 1975, to complete its study and Arthur D. Little's work is to be done by Jan. 6, 1975.

Under an intra-departmental agreement, the Department of Transportation's Transportation Systems Center in Cambridge, Mass. is assisting NHTSA in "analysis and integration of data from contractor and in-house" consumer information studies and in other Cost Savings Act research.

In its efforts to obtain relevant data for a vehicle rating system, NHTSA has met with auto makers and the insurance and repair industry. The automobile insurance industry has been working to assist NHTSA in obtaining insurance information through a nine member committee. Under the sponsorship of that committee, seven member companies of the Highway Loss Data Institute and the Department of Transportation have recently completed a joint, pilot study on the availability and reliability of information contained in insurance company collision claim files obtained by sampling the HLDI data base.

DIAGNOSTIC INSPECTION DEMONSTRATION PROJECTS – TITLE III

The Congress directed DOT to establish not more than ten nor less than five state-run demonstration projects to conduct periodic safety and emission inspections of motor vehicles. The projects are to provide "specific technical diagnoses of each motor vehicle inspected in order to facilitate correction of any component failing inspection."

The projects are also to provide information on the effectiveness of new diagnostic testing equipment, "vehicle designs which facilitate or hinder inspection and repair" and the overall cost and benefits of the demonstration projects.

Thus far, NHTSA has established one demonstration project, located in Washington, D.C. It plans to fund four more by January, 1975.

The agency also plans to award, probably within the next few months, two additional contracts – one for providing engineering support to states in setting up the demonstration projects and the other for assisting NHTSA in the evaluation of the projects.

ODOMETER REQUIREMENTS – TITLE IV

Since "purchasers are entitled to rely on the odometer reading as an accurate reflection of the mileage actually travelled by the vehicle," the Congress directed DOT to establish rules protecting consumers from odometer tampering. In addition, DOT was ordered to prepare a report on how odometers can be made more reliable and tamper-proof.

By rulemaking, effective in January and March, 1973, NHTSA made it punishable by a $1,500 civil penalty to disconnnect, reset or alter an odometer. In addition, a seller of a motor vehicle must disclose the actual mileage, where known, travelled by the vehicle.

In November, 1973, NHTSA reported to the Congress that current odometers are reliable and that most new cars have anti-tampering features. Additional devices, to make odometers tamper proof "do not appear justified at this time," DOT said.

NHTSA plans to conduct spot checks of dealers during the next year to determine if they are complying with the odometer regulations.

NHTSA Undergoes Reorganization

The National Highway Traffic Safety Administration has emerged from a recent reorganization with several new offices. The major program areas affected were those dealing with used vehicle safety, vehicle crashworthiness and damageability rating, advanced safety vehicles and highway safety programs for drivers and pedestrians.

Almost all of the changes occurred in three of NHTSA's five major divisions. Those significantly affected divisions are: Motor Vehicle Programs, the offices which develop safety standards for new vehicles; Traffic Safety Programs, the offices concerned with state highway safety program standards and demonstration projects, and the Research and Development Institute, which conducts research used by the agency in formulating motor vehicle and highway safety standards.

The new offices established within the three primary program areas include:

TRAFFIC SAFETY PROGRAMS

- Office of Driver and Pedestrian Programs. This office will apply the "knowledge, skills and techniques that were developed to manage the successful Alcohol Safety Action Programs [ASAP's] . . . to other driver and pedestrian-related demonstration projects," NHTSA Administrator Dr. James B. Gregory said in announcing the change.

- Office of State Vehicle Programs. It will manage the vehicles-in-use safety standard program and the state motor vehicle inspection demonstration projects mandated by the Motor Vehicle Information and Cost Savings Act of 1972.

MOTOR VEHICLE PROGRAMS

- Automobile Rating Division. It will develop the rating system, mandated by the Cost Savings Act, to compare new vehicles in crashworthiness, damageability and repairability.

RESEARCH AND DEVELOPMENT INSTITUTE

- Office of Vehicle Safety Research. This office will be in charge of NHTSA's new research safety vehicle program (RSV). The RSV program, the successor to the agency's experimental safety vehicle effort, is aimed at developing a 3,000 pound safety vehicle.

An organizational chart for the NHTSA can be obtained by writing to: Office of Public Affairs and Consumer Services, National Highway Traffic Safety Administration, 400 Seventh St., S.W., Washington, D.C. 20590.

CAS Seeking Belts On Buses

The Center for Auto Safety has asked the National Highway Traffic Safety Administration to require safety belts for passengers in all new intercity and interstate buses.

In a formal petition to NHTSA, the Center noted that the National Transportation Safety Board has urged this same action in eight separate reports on interstate bus crashes.

The Center's petition did not ask for safety belts for school buses or for those intercity and interstate buses already on the road.

NHTSA has issued a bus passenger seating and crash protection proposal (See *Status Report*, Vol. 8, No. 5, Feb. 26, 1973), which the agency is "very near issuing again in revised form," according to an NHTSA official. The existing proposal would not require safety belts.

Volvo Questions Auto Maker Cost-Effectiveness Data

Volvo has called for the development of cost-effectiveness methodology acceptable to government, industry and the public. Volvo added that it feels "the auto industry has in some instances taken advantage of the lack of methodology and released biased material aimed purely at resisting regulation."

Cost-effectiveness, Volvo said, should always be a consideration taken into account by the National Highway Traffic Safety Administration in rulemaking but "not necessarily the overruling consideration." Volvo feels that NHTSA has done "a good job in considering cost-effectiveness in new rulemaking action."

Volvo's position was stated in a letter summarizing a May 22, 1974, meeting with the General Accounting Office, the investigative arm of the Congress. GAO is developing a report to the Congress on the use of cost-effectiveness studies in this field.

The Volvo letter also urged that NHTSA cost-effectiveness studies associated with new rulemaking be made public. NHTSA, however, should establish "means of keeping proprietary industry information related to the cost-effectiveness consideration secret so that manufacturers will not be reluctant to submit it to NHTSA," it added. The agency, Volvo said, should "take a manufacturer's resources into consideration when demanding cost-effectiveness information, particularly when requesting it from smaller companies."

A GAO official told *Status Report* that the study, which started a year ago, will be presented within a few months to the Chairman of the Senate Commerce Committee, who may choose to make it public. He declined to comment on Volvo's statement or disclose the statements of other manufacturers. Volvo's comments were filed in the NHTSA public docket on occupant crash protection (FMVSS 208, Docket 69-7).

'Hot Line' Becoming Hot Item

The Department of Transportation's National Motor Vehicle Safety Advisory Council has urged the National Highway Traffic Safety Administration to study the feasibility of a consumer "hot line" for direct consumer communication on automotive safety problems.

The Council resolution points out that "there is no system presently in existence to allow the public to communicate quickly and conveniently with the NHTSA on matters concerning motor vehicle safety."

In a letter to Transportation Secretary Claude S. Brinegar, Advisory Council Chairman Judson B. Branch said the Consumer Product Safety Commission "has had success with such a consumer hot line."

The California Traffic Safety Foundation, in its monthly *California Traffic Facts*, also has urged a hot line for vehicle defects as well as for "the thousands of traffic engineering flaws which delay, damage and kill."

Attorney Ralph Nader earlier urged NHTSA to set up a toll-free hot line for consumers to report safety related defects to the agency as well as to have NHTSA provide consumers with information on motor vehicle safety defects. (See *Status Report*, Vol. 9, No. 3, March 5, 1974.)

A spokesman for NHTSA said the agency is "seriously looking at the proposition." It is a "big project" that will "take time to put into effect," he said.

Jerri Smith, consumer services supervisor for the Consumer Product Safety Commission, told *Status Report* that that agency "started talking" about setting up its hot line in August, 1973. The hot line went into operation Oct. 29, 1973. The service is staffed by six operators with one supervisor. For fiscal 1975, the hot line operation is budgeted at slightly more than $100,000.

NHTSA, Ford Differ On Belt Length

The National Highway Traffic Safety Administration has held a public hearing on its "initial determination" that a defect exists in the front seatbelt assembly of 1972 Mavericks and Comets, both Ford Motor Co. products.

According to NHTSA, "The seatbelt assemblies do not fit a 95th percentile male in the forwardmost seating position, which effectively prohibits their use by 95th percentile males, discourages their use by other smaller individuals, and thereby increases the risk to occupants of death and injury resulting from accidents."

At the hearing, Ford maintained that although the seatbelt assemblies "may be snug," they "do fit 95th percentile males; that they do not violate any safety standard and that there is no defect which relates to motor vehicle safety . . . ."

The final decision on the matter rests with NHTSA's Administrator Dr. James B. Gregory.

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