

Survey Released

Few Children Protected In Cars

An observational survey of children traveling in cars has found that only 7 per cent were properly restrained against possible crash injuries. The remaining 93 per cent were traveling without restraints or were improperly restrained.

“Eighty-two per cent of the children were sitting or standing alone unrestrained, 6 per cent were on someone’s lap unrestrained, 5 per cent were in child motor vehicle restraint devices that were not restrained and/or the child was not restrained within the device, and 1 per cent were using inadequate protective devices,” according to a report on the survey. It was written by an Insurance Institute for Highway Safety researcher, Dr. Allan Williams.

The survey involved observations of 8,893 children less than 10 years old in 5,050 cars at 14 amusement areas and shopping centers in Maryland, Massachusetts and Virginia.

‘PARENTS RESPONSIBLE’

“Although parents bear much of the responsibility for making sure their children traveling with them are restrained whether or not they themselves are, it was found in this study that when parents were driving unrestrained virtually none of their children were restrained. When parents who were driving had taken the initiative to fasten their seat belts, more than 75 per cent of their children were not restrained, and even when all child motor vehicle restraint devices were included whether or not used correctly, more than 70 per cent of their children were not using such devices nor seat belts.

Inside

- | | |
|----------------------------------------------------------------------|-----------------------------------------------------------------|
| ● Belt Use Remains Low, Researchers Find . . . Page 5 | ● New Neck Injury Data Published . . . Page 9 |
| ● Air Bag Test Plan ‘Interesting’ But Page 6 | ● DOT Advisory Panels Get New Members . . . Page 10 |
| ● President Questions Air Bag Cost-Effectiveness . . . Page 6 | ● Swiss Enact Safety Belt Use Law . . . Page 10 |
| ● NHTSA Seeks Detailed Passive Restraint Data . . . Page 7 | ● NHTSA Withdraws Heavy-Vehicle Brake Rule . . . Page 11 |

Child Restraint Handbook Revised

Physicians for Automotive Safety has revised its pamphlet that is intended to be a practical handbook for restraining children in autos.

Copies of the pamphlet, entitled *Don't Risk Your Child's Life*, may be obtained by sending 25 cents and a self-addressed business-type envelope to Physicians for Automotive Safety, 50 Union Avenue, Irvington, New Jersey 07111. Information on bulk orders may be obtained from the same address.

PARENTS 'BETTER PROTECTED'

“Stated differently, parents transporting their own children on average took far better care of themselves with crash restraints than of their children. This was also the case when drivers transported others' children. Why this is so is a question that needs investigation. Questions of legal liability of parents and other drivers for damages might arise in the case of injury to unrestrained children in a crash,” the report said.

“In 1973, 1,090 motor vehicle occupants less than 5, and 1,650 age 5-14 were killed, and passengers of these ages receive many of the nearly 4 million annual injuries resulting from motor vehicle crashes, frequently head injuries,” the report said.

The IIHS survey found, “Among children who were not restrained, younger children, especially those less than two, were much more likely than older children to be on someone's lap rather than sitting or standing alone, although even among those less than one, 16 per cent were on the vehicle seat by themselves. Traveling on someone's lap does not provide crash protection as the infant, even if held firmly will very likely be torn away from the holder by the crash forces. Moreover, if the holder is also unrestrained, as was so in over 90 per cent of such cases, the infant may be crushed between the holder and interior surfaces of the vehicle.”

The survey also found cases where a belt was used to restrain both a child and an adult while the child sat on the adult's lap. This is “a practice likely to result – because of the forward movement of the much more massive adult – in serious abdominal injury to the child in a crash,” the report said.

DEVICES IMPROPERLY USED

Even when child seating devices were in the car, 79 per cent “were either inadequate protective devices [such as 'hook-over' types], were not used by children of the recommended ages for their use, or were not used correctly. Of the child motor vehicle restraint devices in use, only about one in four were used so that the child was restrained within the device and the device itself was restrained,” the report said.

The report cited one child restraint design, typified by General Motors' “Love Seat,” which is equipped with a tether strap that secures the top of the restraint to the car. This strap was anchored to the car in only 35 of 66 such seats that were observed.

The report cautioned generally that “infant carriers and car seats used improperly in the ways routinely observed would function as launching platforms in a crash, flinging the child into upper parts of the vehicle interior, possibly resulting in even more severe injury than would result had the child been sitting unrestrained on the vehicle seat.”

DISCOMFORT, INCONVENIENCE

The report suggested that discomfort and inconvenience are factors associated with non-use or improper use. "The time and inconvenience involved in fastening straps around a child, and restraining the device with the seat belt in cases in which the belt cannot be left fastened around the device, are likely to be greater than in fastening the seat belt around an adult. Moreover, children may well be uncomfortable in car seats, or resist having their movement restricted or their lateral or forward vision restricted as occurs with some."

The report suggested that restraint use could increase with improvements in comfort and convenience. "It is notable that in this survey all 24 car seats in use that had a barrier shield in front, and did not require straps to be fastened, [such as Ford's 'Tot-Guard'] were used correctly. The seat belt is fastened around the shield to restrain such car seats, and many children can get in and out of these seats without the seat belt being unfastened," the report said.

RESTRAINT OF CHILDREN IN AUTOMOBILES

RESTRAINED	PERCENT	NUMBER
Vehicle seat belt only	5	433
Child motor vehicle restraint devices restrained and child restrained within device	2	153
Total children restrained	7	586
NOT RESTRAINED	PERCENT	NUMBER
Sitting or standing alone	82	7,280
On someone's lap	6	565
Child motor vehicle restraint devices not restrained and/or child not restrained within device	5	409
Inadequate protective devices	1	53
Total children not restrained	93*	8,307
TOTAL	100	8,893

*The difference in the column subtotal from the sum of its component percentages is due to rounding.

Warning labels "affixed to the device emphasizing that crash protection is not provided unless the device is installed and used in accordance with specified instructions" could increase the correct use of restraint devices, the report said. Such labels are not required by the federal standard governing child restraints (FMVSS 213).

Even if state laws required that children be restrained, "the issue of correct use of child motor vehicle restraint devices would remain," the report said. "Given these considerations, plus the very low numbers of restrained children and the failure of parents even if restrained themselves to ensure that their children are protected as much as possible from serious injury or death in a crash, it is apparent that

'passive' protection strategies are needed for children," the report said. Possibilities mentioned included such things as air bags and the modification "of some present interior vehicle surfaces."

Citing difficulties in federal rulemaking, the report said that "specially designed restraint devices are likely to continue for some time to be necessary to protect infants traveling in vehicles, and pediatricians and others have an obligation to so inform parents and to encourage the use of these devices," the report concluded.

(Single copies of the report, *Observed Restraint Use of Children In Automobiles*, may be obtained by writing "Children in Autos," Insurance Institute for Highway Safety, Watergate Six Hundred, Washington, D.C. 20037.)

BELTS AS CHILD RESTRAINTS

In another study, due to be published in the *American Journal of Diseases of Children*, Dr. Richard Snyder, head of the Highway Safety Research Institute's biomedical department, and IIHS Research Vice President Brian O'Neill compared the relative merits of safety belts and specially designed child restraints.

Their inspection of published and known unpublished research led them to conclude that:

- "Younger children (and infants) should use specially designed child or infant restraint systems as a highly recommended first choice.
- "Lap belt restraints appear to offer protection even for younger children in the isolated crashes reported. Where child restraints are not available, parents should use lap belts as a second choice.
- "The preponderance of evidence overwhelmingly demonstrates that an occupant, whether infant, child or adult, is less likely to be killed or injured in a crash while restrained. Thus, until contrary evidence is available, 1974 and 1975 three-point belt systems (although designed for adults) should be used by small children where either a child restraint device or lap belted seat position is not available, as a third choice. Whether it offers greater or less protection against impact collision injury hazards than a lap belt alone would appear to depend upon a number of factors related to body size and various restraint and seat positions possible, and is not yet supported by either experimental or field crash evidence. In the interim, parental judgment should be exercised; in some cases it has been suggested that the upper torso belt could be placed behind the child if the fit obviously is incorrect, but this may not be possible or feasible in some cases, and it might be better to move the child in such cases to a center or rear seat equipped with only a lap belt.

Belt Use In Puerto Rico

... The effect of adopting the mandatory belt use law on Jan. 1, 1974, in Puerto Rico has been a mixed reaction. First, belt usage rose from 4 per cent to a peak of 24 per cent. Meanwhile, enforcement produced a negative reaction whereby the law was modified on June 1, 1974, such that a violation would no longer be a misdemeanor and only warnings would be issued by the police. The final effect of the law was measured to be 10 per cent belt usage in October, 1974.

National Highway Traffic Safety Administration
paper to the Office of Management and Budget,
March, 1975

- “Child seats that hook over regular automobile seats should not be used.
- “Under no circumstances should any motor vehicle occupants, including children and infants be unrestrained.”

Citing a scarcity of data, they cautioned that “objective facts related to child occupant impact protection with various restraint systems are very limited.” They also warned that tests which employ “‘child’ anthropomorphic dummies cannot be validly interpreted in relation to injury, as has been attempted in one recent publication [*Consumer Reports*, March, 1975].”

Single copies of *Are 1974-1975 Automotive Belt Systems Hazardous To Children?* may be obtained by writing “Belts and Children,” Insurance Institute for Highway Safety, Watergate Six Hundred, Washington, D.C. 20037.

Belt Use Remains Low, Researchers Find

Researchers have found that drivers were unprotected by lap or shoulder belts in almost two-thirds of the 1975 model cars recently observed in a major metropolitan area.

“The evidence strongly suggests that even the low percentage of belt use by drivers in these vehicles is the maximum likely to be achieved,” according to a report authored by Dr. Leon Robertson, the Insurance Institute for Highway Safety’s senior behavioral scientist, who conducted the research in Houston. As cars get older, belt use “tends to decline by two to four percentage points per year,” the report pointed out. It also noted that passengers have a lower use rate than drivers, and that observations have found that drivers in smaller cities have lower use rates than drivers in large metropolitan areas such as Houston. Many 1975 models were equipped with safety belt interlocks. It was not possible to determine which of the observed cars were manufactured with interlocks or how many of those had been disconnected or circumvented, the study said.

Of 394 drivers observed in 1975 cars, the report said “27 per cent were using the lap and shoulder belt combination and an additional 8 per cent were using lap belts only. In other words, 65 per cent of drivers of 1975 cars had no belt protection whatsoever. The 8 per cent who used lap belts only includes those who had looped the shoulder belt under an arm or placed it behind them while using the lap portion of the belt. Belt use in 1974 cars in this study was essentially identical to that in 1975 cars; 28 per cent of drivers were using lap and shoulder belts and an additional 8 per cent used the lap belt only, meaning that 64 per cent of drivers of 1974 cars were completely without belt protection.”

The report catalogued attempts since 1970 “to increase belt use by vehicle occupants, with little or no success. Advertising has been found to be without effect. A buzzer-light reminder system, installed in some 1972 and all but a few 1973 cars . . . had no effect on overall belt use in these cars.

“A starter-interlock system that prevented cars from starting until belts were manipulated, installed in most 1974 and some 1975 cars, . . . initially increased belt use to 59 per cent in metropolitan areas. However, some vehicle occupants were annoyed by the system and a federal law banned the installation of interlocks”

“Despite the proliferation of buzzers, lights and interlocks,” the report found current belt use in 1972-1975 cars was only 29 per cent. In 1970, belt use in 1968-1971 cars was observed to be 23 per cent, it said.

Opponents of passive restraints “have predicted that lap and shoulder belt usage in 1975 cars would be 38 per cent with an additional lap belt usage of 7 per cent The National Highway Traffic Safety *Status Report*

May 12, 1975

Administration estimates 15 per cent lap and shoulder belt usage and an additional 5 per cent lap belt usage in 1975 cars. The former estimates are clearly too high by about a third (38 per cent estimated as against 27 per cent found in this work) in the case of shoulder belts in the first few months of the cars' use. Considering the declining use of belts as cars get older, the lower use by passengers and especially children, the lower use in smaller cities and the demise of the interlock, the NHTSA estimate appears to be an astute and well based estimate when apportioned over the lifetime of the car," the study concluded.

Single copies of the report are available from "Belt Use – 1975," Insurance Institute for Highway Safety, Watergate Six Hundred, Washington, D.C. 20037.

Won't Delay NHTSA Decision

Air Bag Test Plan 'Interesting' But . . .

The National Highway Traffic Safety Administration has made clear to the Council on Wage and Price Stability that it will not tie its decision on a federal passive restraint standard to the council's plan for a large-scale, federally-funded field test of air bags, whether or not the plan is eventually adopted.

In a letter to George Eads, the council's assistant director of government operations and research, NHTSA Administrator James Gregory said that while the council's "suggestion of a large federally supported test" of air bag equipped cars is "interesting," NHTSA "could not commit" itself to waiting for the results of such a test before deciding whether to require passive restraints.

The council's suggestion that the federal government underwrite a test of 500,000 air bag equipped cars was first publicly mentioned by Eads during testimony before a Senate Commerce Committee hearing March 20. (See *Status Report*, Vol. 10, No. 7, March 31, 1975.)

In his letter to Eads, Gregory said that, "Apart from the obviously difficult (but not impossible) administrative task of equitable selection and the formidable barrier to securing funds, I have to say that NHTSA cannot be against the idea either from increasing vehicle safety or acquiring additional data. Nevertheless, I also have to say that, due to our rulemaking posture, we could not commit ourselves to waiting for the results of such a test as the deciding factor; nor obviously can I say we would not take such results into serious consideration."

President Questions Air Bag Cost-Effectiveness

President Ford has publicly questioned whether air bags have been "proven sufficiently cost-effective for us to require their installation in all cars at between \$100 and \$300 each."

In a recent speech before the U.S. Chamber of Commerce, Ford called for examination of federal rulemaking activity. He mentioned air bags as an example.

"Let me emphasize, however, that we do not seek to eliminate all regulations. Many are costly, but they are essential to preserve public health and public safety, but, we must know their cost and measure those costs against the good that the regulations seek to accomplish," Ford said.

Gregory said he guessed that “what you are implying by your suggestion of a larger test is that our experience with the test fleet of 831 1971 Mercurys and 1,000 1973 Chevrolets (which have accumulated over 76 million miles), plus the 5,500-6,000 1974-1975 ACRS (air cushion restraint system) cars sold to the public, is still insufficient on which to base a decision.” Gregory said he was “disappointed that more ACRS cars were not sold to the public – reduced auto sales and little advertising of the ACRS option served to depress anticipated results,” he noted.

Gregory pointed out that “the present [NHTSA] proposal does *not* specify ‘air bags’ but does specify passive protection based on injury criteria. Thus it is a performance standard, not a design standard.”

‘CHEWING GUM, TIN FOIL AND TISSUE PAPER’

“As a matter of fact, it logically should be our ultimate goal to have but one single occupant protection standard which essentially reads ‘in these . . . kinds of crashes drivers and passengers of cars should not be killed or seriously injured . . .,’ all backed up with objective performance tests. Such a standard would give the ultimate flexibility to manufacturers and we would not forever be squabbling over side-door guard beams, head rests, ‘air bags’ or any individually required items. If somebody figures out how to give such protection with chewing gum, tin foil and tissue paper, he could do so,” Gregory told Eads.

Earlier, Eads’ agency had commissioned Lawrence Goldmuntz, a Washington, D.C. consultant, to study NHTSA’s passive restraint cost-benefit analysis. (See *Status Report*, Vol. 9, No. 23, Dec. 26, 1974.) Eads told Gregory that he retained Goldmuntz “knowing of his opposition to air bags but in the belief that he could make the most credible case for the other side.”

‘ALL SIDES CONSIDERED’

Addressing Eads’ apparent concern that NHTSA has not given sufficient consideration to anti-air bag arguments, Gregory said, “NHTSA is not only required by law, but we feel morally obligated to fully consider the data and views of all sides during deliberations on rulemaking action. For example, our original benefit-cost study was exposed to comments actively solicited from all interested persons or organizations, including critics and advocates, and we feel the report amendment reflects a balanced view of available substantiated data and judgmental input relating to most, if not all, of the controversial areas.”

Gregory said NHTSA’s role “requires that we establish a safety need, develop facts on which to base a proposal to correct a problem, make a proposal, get more facts as a result, and finally make a judgment as to the most effective regulation. This is certainly not to say that we ignore economic or other societal impacts of the regulation that we produce. I am sure you recognize that we began our benefit-cost study early in 1974, long before the requirement for inflationary impact statements or the interest of the Council on Wage and Price Stability.”

Subpoenas Threatened

NHTSA Seeks Detailed Passive Restraint Data

National Highway Traffic Safety Administrator James Gregory has asked auto makers and safety equipment manufacturers to voluntarily submit the “complete information” he says his agency needs to act on proposed passive restraint requirements.

Gregory has told the chairman of the Senate Commerce Committee's surface transportation subcommittee that he will have "no hesitancy" to subpoena the information if it is not voluntarily submitted.

In written invitations to testify at NHTSA's May 19-23 public meeting on passive restraints, Gregory asked auto makers and passive restraint manufacturers for "up-to-date and comprehensive data on passive restraint technology, manufacturer experience, status and plans . . . for different vehicle lines, and anticipated environmental and economic impact of mandatory passive restraint requirements."

Accompanying Gregory's invitation, a 25-page questionnaire detailed specific points that Gregory said he "hoped" auto makers and equipment manufacturers would address in summary at the May meeting. He also asked for "a comprehensive written submission on each of the issues," including:

- The chronology of their passive restraint development;
- Current systems under consideration by vehicle line, including reasons for work on those systems rather than on others;
- Current readiness by vehicle line, including the possible need for modifications to fit different types of vehicles. Passive restraint manufacturers were also to explain why they have not provided auto makers with "some type of passive restraint . . . as an option" in one if not all vehicle lines;
- Availability of passive restraints for retrofit. Manufacturers were asked to explain what restraints are available for retrofit (if any) and on what vehicles. If no such systems are offered, they are to indicate the reasons. (See *Status Report*, Vol. 10, No. 9, April 28, 1975.);
- Future systems under consideration;
- Plans for these systems by vehicle line, including types of systems under development as optional and standard equipment, anticipated marketing dates and expected sales volumes;
- Minimum lead times required for large scale passive restraint installations by vehicle line;
- Both long and short term costs, benefits and economic impacts, including summary cost and weight data by market class weighted averages;
- Weight implications and environmental impact, including the possibility of future weight reductions;
- Passive restraint experience by vehicle line, specifically including problems associated with small vehicles;
- Current and future high speed crash protection capabilities;
- Sled and vehicle test experience, with detailed summaries of the "chronology, extent and results of . . . sled, vehicle and other test experience with passive restraints;"
- Reliability and longevity of passive restraint systems, with comparisons between various active and passive systems.

Should the companies fail to volunteer this data, "it will be necessary to proceed to collect this information under the newly-amended information-gathering powers of the National Traffic and Motor *Status Report*

May 12, 1975

Vehicle Safety Act of 1966 (15 U.S.C. Para. 1401),” Gregory said. (See *Status Report*, Vol. 9, No. 19, Oct. 29, 1974.)

Sen. Hartke had earlier urged Gregory to exercise the subpoena power recently granted the Department of Transportation by the Congress.

In response to Hartke’s urging, Gregory has said that he “will have no hesitancy” in using that power. However, he added, “It does not appear consistent to use mandatory information-gathering techniques in connection with a hearing scheduled to provide the forum for . . . an exchange of opinions.”

New Neck Injury Data Published

University of Michigan researchers have produced a study of the basic properties of the human neck related to injuries such as those received in vehicular crashes involving lateral — that is, side to side — jerking of the head.

The study, sponsored by the Insurance Institute for Highway Safety, is a follow-up to earlier work that established, for the first time, “basic anthropometric data on the neck,” with emphasis on the physiological responses to sudden and extended fore-and-aft wrenches to the head. (See *Status Report*, Vol. 8, No. 22, Nov. 27, 1973.)

According to the more recent study, data from the earlier work “have already been utilized in the design of the ATD-50 anthropomorphic dummy neck by General Motors Corp., in seat designs by the Ford Motor Co., and in occupant protection and dummy standards now under development by the National Highway Traffic Safety Administration.”

Data in the follow-up study include:

- Measurements of head, neck and body anthropometry in standing and normal seated positions;
- Stretch reflex time of sternomastoid muscles;
- Head/neck response to low-level acceleration;
- Voluntary isometric muscle force in the lateral direction;
- Three-dimensional range of motion of the head and neck.

According to the authors of the study, entitled *Basic Biomechanical Properties of the Human Neck Related to Lateral Hyperflexion Injury*, information was compiled “with the intent of providing researchers with data useful in computer modeling of crash impacts, design of improved dummies for sled tests, and development of safer passenger seats and head restraint systems, as well as in other practical applications in the field of automotive safety.”

Single copies of this 307-page technical report by Richard Snyder, Don Chaffin, Lawrence Schneider, David Foust, Bruce Bowman, Thomas Abdelnour and Janet Baum, M.D., are available to *qualified researchers* from the Insurance Institute for Highway Safety, Watergate Six Hundred, Washington, D.C. 20037. Copies also may be obtained from the National Technical Information Service, 5285 Port Royal Rd., Springfield, Va. 22151.

DOT Advisory Panels Get New Members

The Department of Transportation has announced new appointees to two of its advisory panels.

Appointments include 11 new members and two reappointments to the National Highway Safety Advisory Committee and seven new members and two reappointments to the National Motor Vehicle Safety Advisory Council. The committee advises DOT on federal standards for state and community highway safety programs. The council advises DOT on development of motor vehicle safety standards.

New members of the committee are Claud R. McCamment, former director of safety, Kansas State Highway Commission, Topeka; A. D. Alissandratos, city councilman, Memphis; Robert J. Avila, president, Town and Country Transportation and Leasing Corp., Warren, R.I.; Susan P. Baker, assistant professor, Public Health Administration, Johns Hopkins School of Hygiene and Public Health, Baltimore; T. Quentin Cannon, member, Utah House of Representatives, Salt Lake City; John J. Gilhooley, chairman of the board and president, Transport of New Jersey, Maplewood; Trevor O. Jones, director, General Motors Proving Grounds, Milford, Mich.; Robert H. Shertz, president, RLC Corp., Wilmington, Del.; Ruth S. Stockton, Colorado State Senate, Lakewood; Dan Unfug, Jr., president, Central Datsun, Inc., Aurora, Colo.; Ralph W. VanNatta, commissioner, Indiana Bureau of Motor Vehicles, Indianapolis.

Joe G. Matthews, director, Southeast Region, AMTRAK, Miami; Richard C. Tufaro, associate attorney, Milbank, Tweed, Hadley and McCloy, New York City, were reappointed to the committee.

New council members are Joel K. Gustafson, attorney, Ft. Lauderdale; George C. Nield, technical consultant, Automobile Importers of America, Washington, D.C.; Gene Roberts, commissioner, Fire and Police Dept., Chattanooga; Dr. Kenneth J. Saczalski, crashworthiness program monitor, Office of Naval Research, Arlington, Va.; Dr. Basil Y. Scott, administrative director, New York Dept. of Motor Vehicles, Albany; Dr. Julian A. Waller, chairman, Dept. of Epidemiology and Environmental Health, University of Vermont, Burlington; Dr. Ruth E. Winkler, optometrist, Tulsa.

Reappointed to the council were John N. Noettl, director membership services, Automobile Club of Missouri, St. Louis and Herbert D. Smith, consultant, Uniroyal, Inc., Rumson, N.J.

Swiss Enact Safety Belt Use Law

The Swiss government has mandated safety belt use for adults. The new Swiss law, which becomes effective Jan. 1, 1976, also requires children under 12 years of age to occupy the rear seat of a car unless that seat is already filled by other children.

Switzerland's comprehensive new law also requires, for the first time, that safety belts be installed — and used — in delivery vans and minibuses. The current law, in effect since 1971, requires installation of safety belts in cars only.

According to a Swiss government press release, the rear-seat-for-children requirement was included in the statute because children “are not sufficiently protected by safety belts; consequently they are particularly in danger on front seats.” When children must occupy the front seats of cars they are exempt from the safety belt requirement.

The new Swiss law also sets requirements for belts themselves, calling for “three point belts that are simple to use, comfortable, and do not impede, and so endanger, the driver,” the press release said.

“Cars in which there are safety belts impeding the driver’s movements must be re-equipped with new belts by January 1,” the Swiss government said.

According to official Swiss figures, “more than 80 per cent of cars are equipped with belts, but in 1974 only 15 per cent of these devices were used in town centers, 38 per cent on the highways, and 33 per cent on other rural roads.”

Failure to observe the new law will be punishable by a fine of 20 francs (approximately \$8).

Belgium and The Netherlands have also passed compulsory belt laws, due to go into effect June 1, their embassies told *Status Report*. Such laws are also under consideration in Finland, Luxembourg and Germany.

Australia, New Zealand and Sweden currently have mandatory safety belt use laws. In Czechoslovakia and France belt use is required only outside population centers.

In the United States, Puerto Rico is the only major jurisdiction that requires belt use. However, the law is unpopular and, according to an official of the National Highway Traffic Safety Administration, there is “no evidence” of its enforcement. (See box, page 4 and *Status Report*, Vol. 9, No. 14, July 26, 1974.)

NHTSA Withdraws Heavy-Vehicle Brake Rule

The National Highway Traffic Safety Administration has withdrawn its hydraulic brake standard for trucks, buses and multipurpose passenger vehicles. Costs of meeting the requirements “are substantial and NHTSA is not prepared to conclude they are justified in view of achievable safety benefits,” the agency said.

The withdrawn standard would have taken effect September 1 of this year. Whether to abandon or delay the standard as it applies to passenger cars, also effective September 1, is still under consideration, the agency said. NHTSA has proposed a four-month delay in the auto brake requirements. General Motors, Ford and Chrysler, among others, have urged the agency to postpone the standard indefinitely or withdraw it altogether. (See *Status Report*, Vol. 10, No. 6, March 14, 1975; Vol. 10, No. 8, April 11, 1975.)

NHTSA’s decision to exempt trucks, buses and MPV’s from its hydraulic brake standard (FMVSS 105-75) was not accompanied by a proposal for “interim requirements,” which the agency had promised to issue. During NHTSA’s April 1 public meeting to take comments on its plan to postpone, IIHS’s Senior Vice President Albert Benjamin Kelley noted that the agency “has asked [for comments] on proposals to roll back the already adopted hydraulic brake standard for the larger vehicle – yet it has failed to provide an adequate basis for such comment because it has failed to describe what its ‘interim’ approach might be in the event of a roll back.” An agency spokesman told *Status Report* that the “interim requirements” will be proposed soon. In the meantime, these vehicles remain without federal braking requirements.

Susan P. Baker, a research scientist at The Johns Hopkins School of Public Health had warned NHTSA at its public meeting that if the agency abandoned its requirements for heavy vehicles

“approximately one-fifth or more of the vehicles sold in the U.S. would not be covered by any brake standard.”

In announcing its decision to withdraw the hydraulic brake standard’s applicability to heavier vehicles, NHTSA admitted that “truck braking is in many cases substantially poorer than passenger car braking,” and “the generally longer stopping distances and the greater severity of truck accidents justify a safety standard for these vehicles. At the same time, the costs of meeting standard No. 105-75 in all truck, bus and MPV model lines are substantial and NHTSA is not prepared to conclude that they are justified in view of achievable safety benefits.”

During the April 1 meeting, IIHS and the Center for Auto Safety had argued that NHTSA could not abandon the standard because of costs without first evaluating cost and profit data that manufacturers are required to submit – by law – whenever they oppose a safety standard for cost reasons.

“In this case,” according to NHTSA’s decision, “manufacturers submitted costs for light to medium-duty trucks that ranged from \$54 to \$775 per unit (depending on model configuration) to attain compliance with the standard. NHTSA compared these figures with independently-gathered detailed cost and mark-up information and substantiated that the manufacturer’s estimates were accurate.”

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the highway
loss reduction

STATUS REPORT

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