the highway
loss reduction

STATUS REPORT

INSURANCE INSTITUTE
for Highway Safety

Vol. 10, No. 20 December 10, 1975

Fire, Steering Hazards

Chrysler Limits Recall To Police Cars

Chrysler Corp. is recalling some of its 1975 police cars to correct a power steering hose defect associated with certain of its engines, but it is not recalling cars sold to the general public with the same engines and hoses.

According to the auto manufacturer, leaking power steering hoses may cause loss of power steering assist and result in engine compartment fires.

Existence of the hose failures was brought to the attention of the National Highway Traffic Safety Administration by the Maryland State Police and the Insurance Institute for Highway Safety.

A Chrysler official told *Status Report* that the wrong power steering hoses had been used on approximately 4,500 of the 1975 Plymouth Furys and Dodge Coronets equipped with 400 and 440 cubic inch displacement, 8 cylinder engines built in one assembly plant. Although Chrysler is recalling the 2,619 police cars built with those hoses, it does not intend to recall the cars sold to the general public with the hoses, he said.

The Chrysler official said hose failures only occur in police service and that the installed hoses "are adequate" for cars used by the general public. In announcing the recall, Chrysler claimed that the hose failures are caused by "high exhaust manifold temperatures associated with high speed pursuit followed by

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extensive idling common in police service," and said that the recalled police cars would be equipped with a "more heat resistant hose."

Chrysler cars equipped with the same engines and sold to the general public, but built at Chrysler's other assembly plants are equipped with more heat resistant hoses, according to the Chrysler official.

The Institute first notified NHTSA of the possible steering hose defect after being contacted by the Maryland State Police concerning 13 hose failures in its fleet of approximately 400 1975 Plymouth Furys. In seven of those cases "smoke in the engine compartment identified the failure" while "in the other six, fire occurred," the Institute told NHTSA. Subsequently, IIHS reported an additional failure in a Maryland State Police car. Information provided by the Maryland State Police showed the 14 vehicles had from 4,700 to 14,403 miles on them at the time of the failures. (See *Status Report*, Vol. 10, No. 18, Nov. 5, 1975.)

A Maryland State Police official told *Status Report* that the police do not know if the 14 vehicles that experienced failures had a history of hot pursuit use. He noted, however, that the 400 fleet cars are used primarily in highway driving and do not have a "particularly high idling time," especially as compared to vehicles used in urban areas.

(In August, 1970, Ford Motor Co. recalled approximately 85,000 police cars to correct a lower control arm defect, but Ford has not recalled 5.5 million similarly equipped cars sold to the general public. Failure of the lower control arm, a front suspension component, causes a car's front wheel to displace, resulting in a loss of vehicle control. Ford claimed that severe impacts caused the control arm failures and said it did not "believe that civilian units are subjected to the type of operation involving numerous repeated abusive impact loads that are required to initiate arm cracking." See *Status Report*, Vol. 5, No. 15, Sept. 1, 1970.

NHTSA is still continuing its five year old investigation into lower control arm failures. Ford has told NHTSA that it is aware of 884 failure reports. See *Status Report*, Vol. 10, No. 18, Nov. 5, 1975.)

Ford Documents List Safety-Related 'Problems'

Ford Motor Co. knows of – and even provides extended warranty protection for – a number of vehicle components that may affect safety performance, according to the Center for Auto Safety, a Washington-based consumer organization.

At a recent press conference, sponsored by the center and the Automobile Protection Association (a Canadian consumer group financed by the government), internal Ford Motor Co. documents were released which listed automotive components that are covered by "extended policy payments." The center termed these payments "secret warranties" and said that they are usually given only to "obnoxious" customers who persist in complaining.

The center has forwarded the documents to the Federal Trade Commission, asking that the FTC require public disclosure of all such warranties and that manufacturers be made to extend the warranties for any product with a high failure rate.

Copies of the Ford documents were also sent to the National Highway Traffic Safety Administration, according to a center spokesman. A Ford report, titled "Major Customer Product Problems," included several items such as master brake cylinder leakage, windshield fogging, faulty locks and handles, inoperative lights and power steering that sticks and binds. All of these items could fall under NHTSA's jurisdiction.

One major area of complaints cited by the center and APA was rust. Ford has attributed the rust problem to "higher customer expectation and competitive upgrading in corrosion protection." The Ford documents list areas affected by rust including the "station wagon spare tire well and storage compartment." (The Insurance Institute for Highway Safety sponsored a study by a group of Maryland researchers which found that holes in the exhaust system and vehicle body caused by rust were "a major factor" leading to carbon monoxide poisonings. See *Status Report*, Vol. 7, No. 9, May 8, 1972. Corrosion has also been cited as a possible cause for the failure of certain Ford lower control arms. See *Status Report*, Vol. 7, No. 2, Jan. 17, 1972.)

A spokesman for the center said he believes that other auto makers have similar "secret" warranty programs but that the case against Ford was the best documented.

The center urged consumers to write to the FTC for copies of the Ford documents and to notify NHTSA (via the agency's toll-free hotline 800/424-0123) when they discover an automobile defect that may be safety-related.

Ontario Passes Safety Belt Use Law

Ontario has become the first major jurisdiction on the North American continent to require use of safety belts. The Canadian province's law becomes effective Jan. 1, 1976.

The law was enacted with support from all three political parties, prompting a Ministry of Transport official to comment, despite reports of "considerable constituent dissent . . . . We had a love-in." Data supporting mandatory belt use were "too convincing to ignore," he said. The measure needs only assent by Ontario's lieutenant governor, "a matter of form," according to the Ministry of Transport official. In November 1974, Nova Scotia enacted similar legislation, but it was never "proclaimed" law.

The law requires that all motor vehicle occupants wear "the complete seat belt assembly in a properly adjusted and securely fastened manner" unless they have a medical certificate exempting them. The law does not apply when a vehicle is in reverse or when a person "is actually engaged in work which requires him to alight from and reenter a motor vehicle at frequent intervals" as long as the vehicle does not exceed 25 miles per hour.

Drivers are responsible for belt use by vehicle occupants between the ages of 2 and 16 years.

The law gives the government authority to issue subsequent:

- requirements for "the use of child seating and restraint systems" and

- exemptions for "any type or class of motor vehicles" and "any class of drivers or passengers in motor vehicles."

Persons violating the law are subject to fines ranging from $20 to $100.

In order to prevent motorists from circumventing the law by removing belts from their cars, the measure prohibits operation of a vehicle, originally equipped with belts, in which belts have "been removed, rendered partly or wholly inoperative or modified so as to reduce [their] effectiveness."

The belt law is accompanied by another measure that reduces speed limits in Ontario from 70 mph to 60 mph on some highways and from 60 mph and 55 mph to 50 mph on others.

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Safety experts have pointed out that the concomitant introduction of the belt and speed measures will make it extremely difficult, if not impossible, to measure scientifically the extent to which either will have contributed to the expected drop in serious injuries and deaths.

NHTSA Brewing Belt Use Standard

The National Highway Traffic Safety Administration is in the first stages of developing a "performance-oriented" standard to attain "higher rates" of safety belt use, according to a recent announcement by James Gregory, the agency director.

The standard, which is being planned "to allow the greatest flexibility" to the states in attaining belt use rates, is still very much "in the thinking stage," an NHTSA legal official cautioned *Status Report.*

At this time, however, NHTSA is aiming for an 80 per cent use rate among cooperating states "three to five years after such a standard was to go into effect," the official said. This would be compared to the 20 to 30 per cent use rate recently observed by the Insurance Institute for Highway Safety in late model cars. (See *Status Report*, Vol. 10, No. 11, June 18, 1975.)

Other details, such as whether or not the standard would apply to all occupants of a vehicle, and whether both lap and shoulder belt use would be required, have yet to be worked out, according to the NHTSA official.

"I think you can see that if we can develop a Traffic Safety Standard aimed at increased safety belt usage, the states will be able to apply resources toward this end much more freely in terms of Section 402 funds [used for state and community highway safety projects] as well as their own, whether it be for public information and education, legislative development, enforcement or any other techniques for increasing belt usage . . . . All I'm looking for is results," Gregory said.

(In 1972 IIHS studied the effectiveness of six professionally produced television commercials promoting safety belt use. After a nine-month saturation campaign the commercials were found to have had no effect on belt use. See *Status Report*, Vol. 7, No. 11, June 12, 1972.)

NHTSA's timetable for the planned standard is still tentative. According to an agency official, the first official proposal for the standard is not expected before "the first of the year." After that the rulemaking process is expected to take at least eight months to one year. At that point, a proposed highway safety standard would have to be approved by Congress, and NHTSA officials are making no predictions about congressional acceptance of the rule.

Rollback Of Truck Weights Urged

In the heat of the energy crisis, Congress held hearings on methods to alleviate fuel shortages. One possibility discussed was a temporary increase in the amount of weight that trucks could carry on Interstate highways. But what Congress finally passed was a permanent increase in truck weights. The debate over that measure has continued to grow.

Since Congress passed the weight increase at the end of 1974, some state legislatures have adopted, but others have rejected the federal action. A number of national organizations have adopted positions condemning the measure, and some congressmen are continuing to press for repeal at the federal level.

Trucking interests had been unsuccessfully urging the weight increases for several years. In 1974, the Senate Public Works Committee's Subcommittee on Transportation held hearings on the subject "Transportation and the New Energy Policies." Several witnesses, including the head of the National Highway Traffic Safety Administration testified in favor of a temporary increase in truck weights. The bill that came to the floor, however, called for a permanent increase in the gross weight of trucks operating on Interstate highways from 73,280 to 80,000 pounds.

According to Common Cause, a public interest group, the measure was passed "with little congressional deliberation and with the assistance of questionable parliamentary maneuvers combined with a strong, heavily financed lobbying effort by truck interests."

Because it was the closing days of the session, a series of "Federal-aid Highway Act Amendments" were brought to the floor "under suspension." Member of Congress were only able to vote for or against the entire bill with no changes. The bill included the national 55 mile per hour speed limit provision and certain highway construction appropriations, as well as the measure to increase truck weights. (See *Status Report*, Vol. 9, No. 23, Dec. 26, 1974.)

The bigger trucks have not, however, met universal acceptance. Although 17 states have passed legislation allowing the larger trucks on their Interstate highways and 8 states have increased truck weights by administrative action, 13 states and the District of Columbia have defeated attempts to increase truck weights (see map).

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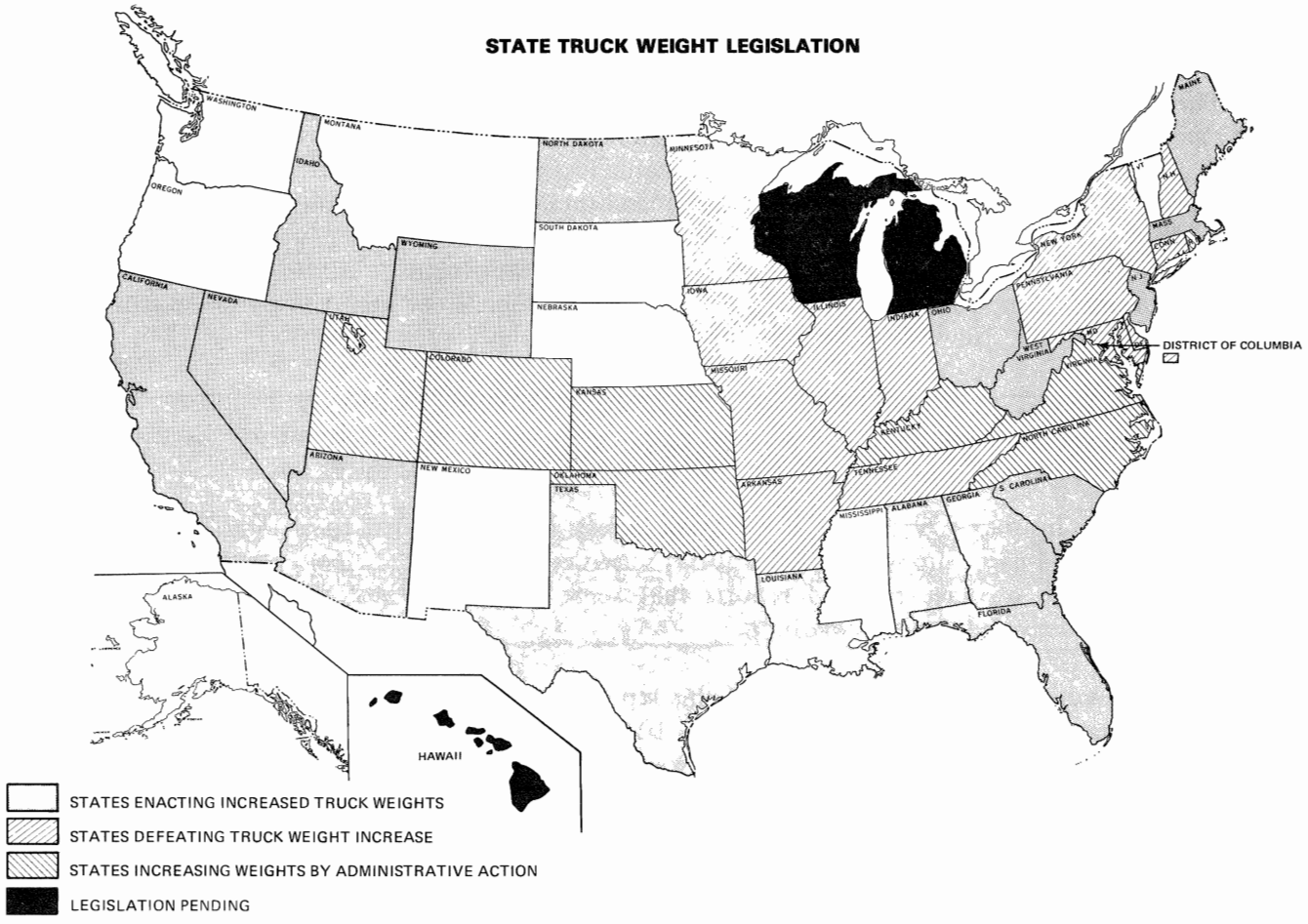

On the federal level, Rep. Edward Koch (D-N.Y.) has launched a vigorous attempt to repeal the increase, and has found 55 co-sponsors for his measure in Congress. Koch's measure, according to an aide, also has the support of a number of organizations including the American Automobile Association, the National Association of Counties, Common Cause, the Professional Drivers Council, the Oil, Chemical and Atomic Workers International Union, the National Society of Professional Engineers, the American Society of Civil Engineers and the National Highway Safety Advisory Committee. Koch also points to the support of NHTSA. An agency spokesman explained that NHTSA had favored a *temporary* increase in truck weights, but was never asked about a permanent increase.

Koch has also proposed:

- if there are to be heavier trucks, then all such trucks must comply with federal air-brake standard FMVSS 121. (See *Status Report*, Vol. 10, No. 18, Nov. 24, 1975);
- front steering axle weights be limited to 10,000 pounds;
- uniform weight laws be established for all federal-aid highways, not just Interstates.

The American Automobile Association told *Status Report* that its "fall back" position is that if Congress won't repeal the measure for Interstate highways, then Congress should make 80,000 pounds the maximum for all federal-aid highways. Some states now permit much larger loads on non Interstates (e.g., Nevada, 128,250 pounds with special permit; Utah, 125,000 pounds; Idaho, 105,500 pounds.)

IIHS Film Receives International Award

The Insurance Institute for Highway Safety film, *Boobytrap!*, recently won a silver statue at the Zagreb, Yugoslavia International Festival of Films on Traffic Safety, where it was one of the official U.S. entries. The 28-minute documentary on roadside hazards had already won two other major awards – from CINE (Council on International Nontheatrical Events) and the National Safety Council.

Boobytrap! was produced by Harvest Films, as were other Institute films – *Cars That Crash and Burn, Small Cars and Crashes* and *. . . In The Crash.* All are available for loan and purchase from Harvest A-V, Inc., 309 Fifth Ave., New York, New York 10016.

To Our Readers: Second Notice

The Insurance Institute for Highway Safety recently mailed to all *Status Report* readers an 84-page summary of Institute activities, entitled ". . . To Prevent Harm." Unfortunately, we have received reports that some copies have not been delivered and others were delivered in poor condition.

If you did *not* receive a copy of this report or received a *damaged* copy, please cut out the name and address portion of page 12 and mail it to the Insurance Institute for Highway Safety, Watergate Six Hundred, Washington, D.C. 20037. We will see that you receive a copy as quickly as possible.

(This notice was also run in the Nov. 5, 1975 issue of *Status Report*. If you responded then, please ignore this notice.)

UPDATE . . .

NHTSA OPENS MOPED DOCKET: The National Highway Traffic Safety Administration has opened a docket "to receive comments on [the] operational safety" of mopeds. It has no plan, however, to issue guidelines for states to follow in regulating highway use of mopeds unless the comments it receives warrant such action, an agency official told *Status Report.*

At this point, the purpose of the docket is to collect comments and data "to ensure that information is available to federal, state and local governments to guide them in regulating the use of mopeds on the public highways," the agency announcement said. Currently, most states regard mopeds as motorcycles. Ten states treat the vehicles as bicycles. (See *Status Report,* Vol. 10, No. 19, Nov. 24, 1975.)

NHTSA said that, on the basis of information it now has, mopeds are "capable of operating for sustained periods at speeds up to 30 miles per hour, and that a large proportion of motorcycle accidents occur at speeds between 20 mph and 30 mph. Consequently, moped accident patterns appear to be similar to those of other classes of motorcycles rather than those of bicycles. Further, it would appear that the skills needed to coordinate the throttle and the front and rear brakes of a moped are considerably more complex than those needed to operate a bicycle. It would also appear that because mopeds have limited ability to sustain speeds above 30 mph, their travel on high speed highways should be restricted," NHTSA said.

Comments should be sent to Docket 75-29, Docket Section, National Highway Traffic Safety Administration, Room 5108, 400 Seventh St., S.W., Washington, D.C. 20590.

APPEALS IN SEATBACK DEFECT CASE: Ford Motor Co. is seeking to have the U.S. Supreme Court review and reverse a lower court decision rejecting Ford's attack on the constitutionality of the penalty provisions of the National Traffic and Motor Vehicle Safety Act of 1966. Ford had brought its suit after being ordered by the National Highway Traffic Safety Administration to recall, and to fix at no charge to the owners, defective seatbacks on 1968-1969 Ford Mustangs and Mercury Cougars.

A three-judge panel of the U.S. District Court for the District of Columbia ruled that the penalty provisions of the vehicle safety act are "not repugnant to the due process clause of the constitution." (See *Status Report*, Vol. 10, No. 16, Sept. 30, 1975.)

The government has also appealed the case, seeking a reversal of the three-judge panel's decision to temporarily stop enforcement of the penalty provisions of the act against Ford.

Omission

The article on the National Highway Traffic Safety Administration's proposed suspension of the air brake safety standard (FMVSS 121) for buses which appeared in *Status Report*, Vol. 10, No. 19, Nov. 24, 1975 neglected to mention that the closing date for comments on that proposal is Dec. 15, 1975.

Measuring Safety Program Effectiveness

Impediments To Program Evaluations Examined

It is "imperative" that valid scientific evaluations be made of existing highway safety programs so that ineffective programs can be eliminated, concludes a recent study of program evaluations. Urging the National Highway Traffic Safety Administration to set evaluation guidelines, the study warned that without effective evaluations, even the "pitifully finite" highway safety funds now available "cannot be allocated to those programs which are most effective in saving lives and reducing injuries and property damage."

Conducted by Lindsay L. Griffin III, Brian Powers and Catherine Mullen of the University of North Carolina's Highway Safety Research Center, the study examined the impediments to evaluation of highway safety programs and suggested steps to improve the current situations. The study was funded by the Motor Vehicle Manufacturers Association.

The study noted that the current use of "common sense" assessments of highway safety program effectiveness has meant that "a rich mythology has arisen concerning the effectiveness of certain countermeasures." Efforts to determine the true effectiveness of highway safety programs have been hampered by a failure to understand and apply scientific program evaluation, it said.

Under standards adopted by NHTSA, states are required to evaluate their highway safety programs. Yet, as the study points out, "relatively few effective evaluations have ever been performed" and those that have "are often riddled with error and fallacy."

According to the study, a proper program evaluation should achieve three goals: "(1) It should determine whether or not the program is accomplishing the goals it was designed to accomplish. (2) It should determine how efficiently the program is accomplishing its stated goals. (3) It should determine if the program is producing results contrary to its goals."

The study identified the following three types of evaluation techniques that have been used to conduct program evaluations:

- Type I or subjective assessment, which is based on "the impressions of so-called 'experts' " and is "usually devoid of numerical data and is necessarily filled with subjective feelings and opinions." The "credibility" of this type of evaluation "can be readily questioned," the study noted.

- Type II, or process evaluation, (see accompanying article), which examines the program to "determine if (and to what degree) the treatments or manipulations advocated at the initiation of a program were carried out."

- Type III, or effectiveness evaluation, which measures the changes the program had on the variables, such as crash involvement or injury rates, that the program sought to influence.

Some highway safety programs, such as those to improve traffic record systems, may only be susceptible to a Type II, process evaluations, the study noted, while other programs that "are specifically designed with goals which can be measured," such as programs to reduce alcohol-related crashes and injuries, should be tested by a Type III effectiveness evaluation.

Type II process evaluations "cannot serve in lieu of Type III" effectiveness evaluations; the study emphasized, "they can only supplement and add to the information which the effectiveness evaluation yields."

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NHTSA Issues 'Process Evaluation'

The National Highway Traffic Safety Administration has released a report on state implementation of several highway safety programs.

The current report is part of a three phase evaluation being conducted by NHTSA of its highway safety programs. The first phase, completed in October 1973, determined how NHTSA grants – section 402 funds – for state and community highway safety programs were spent by the states.

The current report evaluates highway safety program areas covered by the following 7 of the 18 current highway safety program standards: police traffic services, adjudication, emergency medical services, alcohol and traffic safety, driver education, driver licensing and periodic motor vehicle inspection. The current report fits the definition of "process evaluation" used by the University of North Carolina researchers in their study of impediments to evaluating highway programs (see accompanying article). It covers state and federal expenditures on the programs as well as information on the number and types of actions carried out under the programs, such as the number of traffic-related emergency medical responses and the number of citations issued for traffic violations.

The third phase of the NHTSA evaluation will measure the effectiveness of highway safety programs in reducing crashes, deaths and injuries. According to an NHTSA official, the effectiveness evaluation is still in its "initial stage," and no estimate can yet be made as to when it will be completed.

Research by the Insurance Institute for Highway Safety has evaluated several highway safety programs. The findings of that research:

- **state helmet use laws** have reduced fatalities (see *Status Report,* Vol. 10, No. 18, Nov. 5, 1975);

- **NHTSA-funded alcohol safety action programs** produced "no evidence of reduction in overall fatalities or in nighttime fatalities" (see *Status Report,* Vol. 9, No. 13, July 8, 1974);

- **NHTSA-funded fatal crash reduction program,** which was designed to reduce fatalities through intensified police enforcement of traffic laws, had no beneficial influence on crash deaths (see *Status Report*, Vol. 9, No. 10, May 15, 1974).

Copies of the current NHTSA report, *Statewide Highway Safety Programs Assessment; A National Estimate of Performance,* can be obtained at no charge from: National Highway Traffic Safety Administration, General Services Division, Room 5202, 400 Seventh Street, S.W., Washington, D.C. 20590.

(Impediments . . . Cont'd from page 8)

Failure to conduct proper evaluations is due in part to a lack of knowledge about the purposes of program evaluation. "Rather than asking whether or not a certain program is effective, many citizens, legislators, and administrators feel that they *know* which programs are effective."Because they "*know* that the program which they advocate works . . . the notion of evaluation never occurs to them," the study said. Instead, reliance is often placed on the opinions of "expert witnesses" who have "little or no training in the field of highway safety and little or no training in evaluation methodology."

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Is it time to bury the holiday death watch?

Holiday driving may be no more dangerous than weekend driving, but you'd never know it from the news

by ROBERT J. SAMUELSON

Like weather stories, holiday traffic accident stories are a media staple. The wire services religiously churn them out, copy editors give them a quick once-over, and then they routinely find their place on news programs, and in newspapers.

Few things are as strong as the force of habit, but holiday accident stories may be one habit worth discarding — or, at least, overhauling. The premise of the stories — *that holiday periods represent the year's most hazardous driving periods* — may be wrong. At least, it's open to serious question. But for years, the press — abetted by the National Safety Council, which publishes projections of holiday fatalities — has played along with the assumption. If this assumption is off base, then millions of Americans have been given an exaggerated picture of the danger of holiday driving.

As it now exists, the holiday death story dates back to at least 1948, when the Safety Council — a nonprofit organization financed largely by dues from industry members — began making projections of holiday fatalities at the request of the media. "The wire services asked that the estimates be made because they considered the information newsworthy," according to Ron Kuykendall, an information officer for the Safety Council. "The council agreed to make the estimates because they provided an opportunity to place a safety message before the driving public during a dangerous driving period." It was a simple, apparently innocuous marriage of convenience: the media needed an outside "authority" for projections; the council performed a "good deed" and, in the process, collected some favorable publicity.

However, the continuation of the marriage depends on the extraordinary danger of holiday driving. If the holidays weren't unduly hazardous, they wouldn't be "news." And indeed, a survey of the scanty records that bear on this problem indicates that there is questionable evidence that holidays are more dangerous, and there is some evidence that they are not. The Safety Council clearly believes that holiday driving is more dangerous. In its *Accident Facts* (1974 edition), for example, it declares:

> Both deaths and death rates are higher during holidays than they are during comparable nonholiday periods. For traffic deaths, the number that occurred during five holidays (excluding Thanksgiving) over the three years 1971-73 was 24 percent higher than what would have been normal for nonholidays at the same time of the year. Over these same holidays, vehicle travel was 4 percent higher. Because deaths increased more percentagewise than travel, *death rates* averaged 21 percent higher during the holidays.

The problem with these figures is that they are derived from comparisons that may involve a perfect example of apples and oranges. That, at least, is the way they strike Brian O'Neill, vice-president for research of the Insurance Institute for Highway Safety, a nonprofit organization which is sponsored by the major casualty insurance companies in the United States.

For its figures, the Safety Council compares deaths during a three-day holiday period — say a Friday, Saturday, and Sunday — with the *same* three days in the previous week and in the following week. (The comparison also includes the six hours of the evening preceding the first day of the holiday.) O'Neill argues that this approach creates an automatic distortion. Driving patterns during a holiday period resemble those of a weekend, not those of an ordinary Friday or Monday, he says. Normal weekday driving involves slow-moving commuter traffic, where the risk of fatality is lower; in contrast, both weekend and holiday periods mean more social driving — usually at higher speeds — and more drinking and driving. Thus, O'Neill argues, it makes more sense to compare holiday periods

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THE DEATH-WATCH NUMBERS

1973 holiday automobile fatalities compared with those on non-holiday weekends

Holiday	Holiday deaths, per day	Deaths per day, Saturday of same month	% difference	Deaths per day, Sunday of same month	% difference	Average daily weekend deaths same month	% difference
Memorial Day May, 3.25 days	222	219	+1	175	+27	197	+13
Fourth of July July, 1.25 days	236	242	−2	193	+22	218	+8
Labor Day September, 3.25 days	231	233	−1	187	+24	210	+10
Thanksgiving November, 4.25 days	160	204	−22	163	−2	184	−13
Christmas December, 4.25 days	153	178	−14	143	+7	161	−5
New Year January, 4.25 days	132	183	−28	146	−10	165	−20

This table, which reflects the analysis of Brian O'Neill of the Institute of Highway Safety, compares average daily deaths during holiday periods with those over weekends during the same month. The table suggests that a holiday's duration plays an important part in determining the risk of driving. Each of the four-day holidays (Thanksgiving, Christmas, New Year's) recorded lower average daily deaths than weekends. During 1973, the average number of daily deaths during a holiday and during weekends were almost identical.

to other weekends in the same months.

O'Neill made such a comparison for 1973, and the results are interesting. With one exception, the average number of deaths per day during the holidays was *lower* than the average number of deaths on Saturdays of the same month. Comparison with Sunday death totals tends to show *higher* average fatalities on the holidays, although there were two exceptions (Thanksgiving and New Year's) when the average daily deaths were lower on the holidays. When both Saturdays and Sundays are combined, the average number of daily deaths on the weekends was higher than the holiday daily averages for three holidays, and lower for the other three. Lumped together, the pluses and the minuses tend to cancel each other; in other words, the number of deaths for each day of the holiday and each day of the average weekend are just about equal.

The point of all this, O'Neill says, is not that holidays are safe (they aren't, he insists), but that they are probably no more unsafe than most weekends. By focusing on the hazards of holiday driving, the media "may be guilty of misrepresenting the weekends — of convincing the public that there's only a problem on holidays."

Other safety experts are less charitable toward the media and the Safety Council's treatment of holidays. William Haddon, Jr., former director of the National Highway Safety Bureau and now president of the Insurance Institute, says the holiday fatality stories are "a successful piece of hucksterism" and that they divert attention from more serious highway-safety problems.

J. L. Recht, director of the Safety Council's Statistics Division, takes issue with O'Neill's conclusions. "I don't think he's made a proper comparison." His point: the figures for the weekends in the months O'Neill matches with the holidays include the holiday periods, so "you've got an inflated base." This is a valid criticism, but it is not clear that it makes much difference in this case. According to the Safety Council's own *Fact Book*, the Saturday and Sunday death totals during holiday months often tend to be very close to the averages for the preceding and following months.

If this all sounds inconclusive, that is probably as it should be. The truth is that research into the real danger posed by holiday driving is skimpy, and what exists is probably outdated. The study that the Safety Council uses to buttress its conclusions is nearly two decades old. Undertaken jointly by the Safety Council and the then-Bureau of Public Roads, that study attempted to compare fatalities (estimated by the Safety Council) with total vehicle miles driven on holiday and nonholiday periods (estimated by the bureau between 1955 and 1957). The study did, indeed, conclude that holiday driving was more dangerous, but a closer examination of the results leaves plenty of room for doubting whether the findings are, after twenty years, still valid.

Not only does the same problem of comparison raised by O'Neill apply as well to the older study, but there also has been a major change in holidays in those two decades: the holiday periods have consistently gotten longer. Back in the mid-fifties, many holidays were just one day. One-day holidays involve the highest death rates, presumably because people are squeezing their travel into a shorter time period and are rushing more. On the other hand, longer holidays tend to show lower daily death totals — probably for the same reason. With the legal reshuffling of holiday periods, almost all holidays are three days and many are four. How does this affect risk? How has the amount of travel on holidays against similar nonholiday periods changed over the past twenty years? How does this influence risk? (If there is much more holiday travel, is the real risk correspondingly decreased?)

No one, unfortunately, knows the answers to these questions, but, until someone finds out, it might be a good idea for the Safety Council and the press to stop pretending that their answers are the right ones, and for the press to take a closer look at the practice of holding holiday death-toll extravaganzas. ■

(Impediments . . . Cont'd from page 9)

In addition, opposition to program evaluation can come from local, state and federal program administrators who fear any evaluations will show their programs have little or no effect – thus threatening their jobs, according to the study.

Even when a decision has been made to evaluate a program, there is a lack of qualified technical people to carry out the evaluation, the study observed. This lack of technical expertise can result in a failure to use an adequate research design to evaluate the program.

The study points out that one of the best designs – the before and after design with randomized experimental and control groups – is "unfortunately" only infrequently used in highway safety program evaluation. That design compares two or more comparable groups, one of which is subjected to the program (treatment group), and one of which is not (control group). Measurements of both groups are made before the program is started and after it has been in effect for some time.

To improve the current situation, the study recommends several steps, including an increased effort by NHTSA to require states to conduct program evaluations. It urges NHTSA to "define in very explicit terms what they will accept as an adequate evaluation from the states." Once adequate evaluation procedures are established, NHTSA will then be in a position to threaten loss of highway safety program funds for a state's failure to evaluate its programs. But, it warned, if NHTSA "does not act responsibly on the evaluations," and make necessary changes in its highway safety program standards, then "state administrators will correctly perceive the whole process as a bureaucratic waste of time and money."

Copies of the study, *Impediments to the Evaluation of Highway Safety Programs,* can be obtained for $3.00 from: Lyn White-Rodgman, Publications Manager, Highway Safety Research Center, University of North Carolina, Chapel Hill, North Carolina 27514.

the highway loss reduction

STATUS REPORT

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INSURANCE INSTITUTE for HIGHWAY SAFETY
WATERGATE SIX HUNDRED • WASHINGTON, D.C. 20037
(AREA CODE 202-333-0770)