

Public Citizen's Response to the National Highway Traffic Safety Administration (NHTSA's) Upgrades to the New Car Assessment (NCAP) Program

| Crash Mode | NHTSA's Upgrade | Assessment |
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| Frontal | Will include a 5 th percentile female dummy test Will base injury potential on real-world AIS 3+ and AIS 2+; this lowers the threshold for injury from the current system which uses more severe AIS 5+ and AIS 4+ injuries. | We support inclusion of 5 th percentile female Did not add knee-thigh-hip injury criteria or instrumented lower extremities Did not harmonize with EuroNCAP and Japan NCAP for femur injury criteria |
| Side | Will include pole test using 5 th percentile female dummy, and will not wait until 214 upgrade phase-in is complete Will include rear-seated 5 th percentile female for moving deformable barrier test Will upgrade injury criteria to make consistent with 214 upgrade | We support use of the pole test for NCAP Support upgrade of injury criteria Did not change moving deformable barrier character to make more consistent with large vehicles – the moving deformable barrier is currently like a car front, it should be like an SUV front |
| Rollover | No change to risk model yet – waiting for ESC data Will still establish rollover risk based on static stability factor and fishhook test | Will not conduct dynamic rollover crashworthiness test at this time The rollover NCAP program still will not provide consumers enough information about rollover crashworthiness, and the SSF/fishhook model is of limited usefulness |
| Rear | NHTSA will direct consumers to information on its NCAP website about proper head restraint positioning | Did not include a dynamic rear impact test for NCAP, although there is a dynamic rear crash test for safety compliance |

| Other Aspects | NHTSA's Upgrade | Assessment |
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| Crash Avoidance Ratings | NHTSA selected three crash avoidance technologies which it will list the presence of each on the NCAP information label. These technologies are: electronic stability control, frontal crash warning and lane departure warning | NHTSA will provide no information about relative effectiveness of a given system installed on a particular vehicle The effectiveness estimates NHTSA lists for these technologies are functionally useless because they are based on an averaging of all the systems on the road |
| Presentation | NHTSA will consider including additional information and alternate methods of distributing this information and post this information on its website NHSTA will continue to use stars for the ratings | We support giving consumers additional information at point of sale We support using an A-F grading system instead of stars, because it gives consumers a better sense of relative performance |
| Combined Rating | NHTSA will provide a summary crashworthiness rating and individual scores for each test Rollover risk rating will not be included in combined crashworthiness rating | We have no objection to summary rating if consumers are given individual ratings, but NHTSA should be careful not to rely too heavily on marketing the summary rating as a complete picture of performance We support the exclusion of rollover risk rating from combined rating since it is not a crashworthiness rating |
| Compatibility | NHTSA will not include in NCAP at this time; will reassess if compatibility research produces a metric for compatibility | We support an NCAP rating for compatibility and aggressivity. NHTSA and industry have done extensive research. Industry has a voluntary compatibility standard, which is insufficient |
| Child Restraints | NHTSA will not test child restraints at this time | There is no safety information about child restraints, NCAP is an important means of providing this information Europe has child restraint ratings as part of its NCAP program |
| Pedestrians | NHTSA will not test for pedestrians while discussion of global technical regulation still on-going | Europe and Japan have pedestrian NCAP, and the harmonization should not delay this program |