

Appendix H

A Hummer of a Tale: Safety Groups Respond to Alliance of Automobile Manufacturers' Defense of SUVs

On February 25, 2003, the Alliance of Automobile Manufacturers published a five-page document rushing to the defense of the SUV. But their glossy attempt to spin the issue perpetuates several misunderstandings, and fails to demonstrate any meaningful industry commitment to fix the serious safety hazards that plague SUVs. Public Citizen responds below.

1. SUVs are *not* as safe as cars.

- Even the Alliance agrees—occupant fatality rates for SUVs (16.25) are higher than for cars (15.70). (*See Alliance graph p.3*)
- Moreover, it is unethical to highlight the issue of “safety,” as the Alliance does here, without looking at the effects of vehicles upon others on the road. It is profoundly irresponsible for anyone (including the industry) to promote any vehicle as “safer” when it puts others at greater risk than the vehicle many consumers would otherwise drive.
- The comparison with car fatality rates is unfair because the carnage in crashes involving SUVs and pickups with cars is inflicting extra damage on car occupants and depressing safety gains in cars. The Alliance must analyze the real effect of a substitution of SUVs for many cars on the highway.
- A make/model analysis by experts Marc Ross and Tom Wenzel has shown that SUVs are among the most dangerous vehicles when risk to their drivers is combined with the risk to the drivers of other vehicles on the road. A basic standard for violence reduction on the highway is needed, and Congress should act to address this externality of SUVs.

2. Safety technology is not available in many models.

- The Alliance fails to mention what fraction of cars use these technologies, and General Motors has recently announced that it will not include side impact air bags in many of its new vehicles. A basic standard for crashworthiness is needed.
- In 1997, automakers also promised that many new aggressivity and crashworthiness improvements were coming, and yet many of these changes have never materialized in new vehicles. A basic standard for compatibility is needed.

3. Rollovers may be rare, but they *are* deadly, especially in SUVs.

- While rollover crashes are rare events, representing only 2.5 percent of all crashes, *almost one third (32 percent) of all occupant fatalities are rollover-related (over 10,000 per year).*¹ And, when they occur today, rollovers are often deadly. According to NHTSA, 20 percent of fatal crashes involve a rollover.
- The high center of gravity makes rollovers in SUVs particularly likely, and when they do roll, the boxy shape makes them violent. Yet basic crash protections



could save many lives in these crashes, because they tend to be more survivable than many crash types.

- SUV makers have fought basic minimum rollover propensity standards for over a decade, and rollover crashworthiness protections for just as long.
- Moreover, SUV and passenger car belt-use rates are virtually identical in fatal rollover crashes, proving nothing about the safety of either type of vehicle. Sixty-eight percent of passenger car occupants and 69 percent of SUV occupants killed in fatal rollover crashes presumably were not using restraints.²
- Far from proving that SUVs are safe and fatalities are the occupants' fault, the Alliance's assertion shows the continuing failure to install basic safety design features that could save many lives.

4. The emphasis on “shared responsibility” is another attempt to blame consumers, but fails to explain the special hazards of SUVs.

- SUV drivers killed in rollovers are, in fact, considerably less likely to be either speeding or drunk than are passenger car drivers involved in a fatal rollover crash.³ As above, belt use rates in SUVs are also higher than in cars.
- Even as belt use rates have increased in the U.S., the rates of deaths in SUVs per miles traveled has continued to increase, showing the need for basic regulation of these gas-guzzling highway behemoths.
- Automakers have a shared responsibility to reduce the aggressiveness of these dangerous vehicles, and yet utterly fail to mention vehicle compatibility measures in their official defense of the SUV. This serious oversight should be corrected by Congress.

Sources:

¹ See National Center for Statistics Analysis at the National Highway Traffic Safety Administration: *Characteristics of Rollover Crashes*, DOT HS 809 438, (Apr. 2002), at 13-14.

² *Id.*, at 47.

³ *Id.*, at 34 and 37 (In fatal rollover crashes, fifty-three percent of passenger car drivers were speeding compared with 39 percent of SUV drivers. And speed is an important factor in the fatality of rollover crashes; in 2001; nearly three quarters of all fatal rollovers took place on roads where the speed limit was 55 miles per hour or higher. Furthermore, while passenger car and SUV drivers were equally likely to have a 0.01 to 0.09 Blood Alcohol Concentration when getting into a fatal rollover crash, 39 percent of passenger car drivers were at 0.10 or over while only 27 percent of SUV drivers were (0.08 is the legal level for intoxication)).

