

**NHTSA'S PRIORITIES ARE TITLE 4'S**



*None of the major SAFETEA provisions establishes new priorities for NHTSA – and many are identical to NHTSA’s stated goals. The bill merely gives many of NHTSA’s already-planned actions a timely certainty. The Administration’s per se objection to a requirement in these areas is both misguided and misplaced.*

**SAFETEA Provision**

**NHTSA’s Plans: On the Record**

<p><b>Rollover prevention:</b> A rollover prevention standard to improve vehicles’ resistance to rollover and a study of electronic stability control.</p>	<p>Rollover, including prevention, is one of the agency’s four major priority areas. NHTSA has plans to research ESC in 2004-05 and will also evaluate a vehicle handling test for the New Car Assessment Program (NCAP).</p>
<p><b>Rollover survival:</b> An upgraded roof crush standard; improved seat structure and safety belt design (including belt pretensioners), side impact head protection airbags, and side head protection airbags and upgraded door locks.</p>	<p>NHTSA plans to upgrade the roof crush standard soon. NHTSA is currently researching belt pretensioners and side-window ejection mitigation and is plans to upgrade the door lock standard. NHTSA also plans to upgrade the side impact test to require head-protection side-impact airbags.</p>
<p><b>Front Impact:</b> Upgrade the frontal impact test procedure, consider new barriers and head impact and neck injuries, as well as offset barrier testing.</p>	<p>NHTSA’s on-record priorities include an upgrade of crash-test dummies now used in frontal crashes and evaluation of a frontal offset barrier test during 2004.</p>
<p><b>Side Impact:</b> Upgrade the side impact standard by considering new barriers and measures of occupant head impact and neck injuries and upgrade to dummy tests.</p>	<p>NHTSA’s priorities include an upgrade of the side-impact standard to address light trucks and upgrade of injury criteria and data from second-generation side impact dummies.</p>
<p><b>Aggressivity/Compatibility:</b> Standard to reduce vehicle incompatibility; a standard rating metric to evaluate compatibility and aggressivity and a consumer information program to communicate this information.</p>	<p>NHTSA published a “Priority Plan” on vehicle compatibility, another of the agency’s four major priority areas, and plans to evaluate the feasibility of a compatibility requirement by 2004 and to develop an aggressivity metric thereafter.</p>
<p><b>15 Passenger Vans:</b> Include 15-passenger vans in relevant safety programs, require 15-passenger vans to comply with relevant safety standards, and evaluate technologies to assist drivers in controlling the vans.</p>	<p>NHTSA will continue public education on the hazards of 15-passenger vans, require lap and shoulder belts in the vans, and include them in the upgraded roof crush rule. NHTSA also plans to evaluate ESC for 15-passenger vans.</p>
<p><b>Tire Safety:</b> Upgrade tire safety to improve strength, road hazard, bead unseating and aging performance criteria – all as asked for once in TREAD, and discarded by the agency.</p>	<p>NHTSA plans to research tire strength and aging (2003-2004).</p>

<p>Child Safety – Booster Seats, Backover Avoidance, Power Windows, Test Dummies and Rollover: Establish a state incentive for booster seat laws. Increase the use of child dummies, develop a new child dummy for rollover testing, develop a consumer information program relating to child safety in rollover crashes, and report on the performance of safety belts for children in rollovers. Report on technologies used to prevent injuries and deaths caused by automatic windows and a standard to ensure safer switches, and study methods to reduce injury and death outside parked vehicles.</p>	<p>NHTSA is developing a 10-year-old child crash dummy and looking into developing a three-year-old child dummy. NHTSA is also establishing performance requirements for booster seats and planning to compile death certificates to look at off-road vehicular deaths, including driveway incidents.</p>
<p><b>Safety Belt Reminder Systems:</b> NHTSA to address alternate means to encourage increased belt use including consideration of audible or visual reminders.</p>	<p>NHTSA plans a study of the effectiveness of belt minders and evaluation of possible rulemaking (2003-2005).</p>

**In fact, there are no surprises in the bill. All the areas highlighted are areas of clear existing need that have been discussed for decades, as NHTSA’s plans show.**

Yet action is uncertain without deadlines. **As the chart at the end of Chapter One shows**, there is a long history of unfortunate slippage between plans and promises – and *NHTSA’s record on all of these issues is one of unreasonable delay and many broken promises to act. A mandate will assure that NHTSA’s activities achieve the greatest possible savings in lives.*

Some critics of the bill have suggested that safety belt use should be the only focus of efforts to save lives. Critical provisions relate to safety belt and child restraints in the bill, such as; 1) changes regarding safety belt reminder systems; a report on technologies to improve the performance of safety belts for children between the ages of 4 and 8; and establishment of a grant state incentive program for states that enact laws mandating booster seats for children who are too big for child safety seats.

And while increasing safety belt use is a critical goal, the statistics do little to explain the high death rates in SUVs. In fact, SUV occupants are just as likely as car occupants to wear safety belts:

- NHTSA statistics show that 78 percent of SUV and van occupants, and 77 percent of passenger car occupants, wear their belts.<sup>i</sup>
- In fatal rollovers, the most deadly of crashes, SUV and passenger car belt-use rates are virtually identical, *yet these crashes are 61 percent of SUV occupant deaths but comprise only 24 percent of car occupant deaths.*<sup>ii</sup>

**In the face of preventable suffering, there is no good reason for delay.**

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<sup>i</sup> See National Center Statistics and Analysis, *Safety Belt and Helmet Use in 2002-Overall Results*, Sept. 2002, at 8.

<sup>ii</sup> National Center for Statistics and Analysis, *Characteristics of Rollover Crashes*, April 2002, at 47 and National Center for Statistics and Analysis *Motor Vehicle Traffic Crash Fatality and Injury Estimates for 2002* at 50.