

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
Frontal	Will include a 5 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> percentile female dummy, and will not wait until 214 upgrade phase-in is complete Will include rear-seated 5 <sup>th</sup> 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
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 safety rating and individual scores for each test Rollover risk rating will be included in combined safety 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