

August 9, 2001

Jeffery W. Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

**Blue Ribbon Panel for Evaluation of Depowered and
Advanced Airbags: Field Data Collection and Analysis**

**Monitoring the Performance of Depowered and Advanced Airbags
and Developing Data for Potential Future Airbag Rulemakings
Docket No. NHTSA 2001-8953**

Dear Dr. Runge:

Enclosed are the comments of the Blue Ribbon Panel for Evaluation of Depowered and Advanced Airbags in response to the request for comments in Docket No. NHTSA 2001-8953. The notice, which appeared in the Federal Register on Monday, June 9, 2001, requests comments on the National Highway Traffic Safety Administration's (NHTSA) plan for monitoring the performance of advanced airbags and developing data for potential future airbag rulemakings.

In a letter to the Office of Management and Budget, April 5, 2000, the Alliance of Automobile Manufacturers (Alliance) committed to contribute to "a major real-world data gathering program to provide a greater factual basis for future air bag rulemakings." In that letter, the Alliance also committed to establishing a blue ribbon panel to provide oversight of the goals, methods, and findings of the data-collection effort to ensure these investigations follow accepted scientific procedures and result in the additional data needed to address important questions regarding frontal airbag performance. The purpose of the panel is not to advise NHTSA about changes to the agency's crash investigation practices or its future rulemakings, but rather to ensure the Alliance-funded effort is consistent and compatible with the agency's plan for airbag investigations.

The panel has been formed and has met formally twice to date. It consists of representatives from the auto safety research community, the National Transportation Safety Board, academia, medical institutions, and the insurance industry. It also includes representatives from government and the auto industry in observer

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status (see attachment for a list of committee members and observers). The purpose of this comment is to keep NHTSA informed of the panel's current activities as well as those planned for the future.

The panel has agreed that the Alliance-funded study should gather a probability-based sample of frontal crashes of all severity levels using the National Automotive Sampling System (NASS) framework. Of interest are passenger vehicles from the current model year and the four prior model years as well as all front-seat occupants. Higher severity crashes will be oversampled using a stratified sampling plan that will preserve the ability to make national projections. The crash data collected will be fully compatible with the current NASS/Crashworthiness Data System (CDS) cases, thus enhancing the ability to use the total NASS/CDS file for statistical analysis. The ultimate goal of the data-collection effort is to provide additional evidence that depowered and advanced airbags are providing adequate protection to all occupants across the range of crash severities while not increasing the risk to any occupant. The additional frontal crash investigations afforded by the Alliance-funded study should hasten the accumulation of evidence needed to assess the overall real-world performance of depowered and advanced airbags. Furthermore, individual crash investigations will provide timely additional anecdotal evidence of how new technologies are performing in frontal crashes.

The crash data will be collected at three newly created NASS/CDS sites. The sites will be selected from existing NASS General Estimates System sites by the agency's National Center for Statistics and Analysis based on the availability of relevant cases (as previously noted, the sites also will be selected with a view toward preserving the ability to make national estimates). The Alliance will negotiate three contracts to accomplish the overall program, two with the Zone Centers that currently manage NASS and one with the Volpe Center for setup and maintenance of software and hardware for the electronic database. It is anticipated that the contract duration will be 4 years -- a 3-year data-collection period, preceded by a 6-month ramp-up for investigator training and setup of sampling logistics and followed by a 6-month wind-down period. It is hoped that the contracts will be in place by the middle of August 2001, which would mean data collection could begin as early as January 2002. A total project expenditure of \$4.5 million is anticipated. Initial estimates are that approximately 1,350 additional frontal crashes will be investigated during the study period. The Alliance is currently working with NHTSA to draft a memorandum of understanding that will detail the relationship between the Alliance, NHTSA, and the contractors. The primary purpose of the memorandum is to ensure there is no disruption to the agency's ongoing NASS data collection.

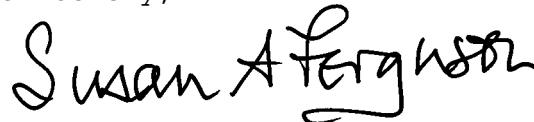
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Once data are available, the panel will begin hosting semiannual public meetings, to be announced by public notice. The agenda will include a status report of case collection as well as a review of cases of interest. For example, there could be a review of cases involving large males in high-speed crashes, because it has been alleged that depowered airbags may not provide adequate protection to these individuals in more severe crashes. The panel also intends at some time in the future to host a website containing all relevant information generated during the study.

A portion of the available funding has been set aside for analysis and evaluation, and an analysis plan is currently being drafted. Analyses conducted by panel members and NHTSA staff indicate that the combined NASS/CDS file (the 4000+ yearly NASS/CDS crashes currently being investigated by NHTSA combined with the 1,350 additional frontal crashes during 3 years expected from the project) should provide the capability to discriminate in a timely manner any significant changes in effectiveness between pre-depowered, depowered, and advanced airbag systems. For example, a large change such as a doubling or halving of effectiveness could be detected with 1 year of combined data. A more subtle change in airbag effectiveness, such as a 20 percent increase or decrease, could be detected with 4 years of data. Thus, the panel is optimistic that the combined data set will be helpful for setting future public policy on optimal airbag protection for the full range of occupants across all crash severities.

The panel has received excellent support from NHTSA to date. We look forward to a long and productive collaboration addressing this important public policy concern. Thank you for the opportunity to comment on the agency's plans.

Sincerely,

A handwritten signature in black ink that reads "Susan A. Ferguson". The signature is written in a cursive, flowing style.

Susan A. Ferguson, Ph.D.
Senior Vice President, Research
Insurance Institute for Highway Safety
Chairperson, Blue Ribbon Panel

cc: Docket No. NHTSA 2001-8953

ATTACHMENT

Blue Ribbon Panel Members

Dr. Susan A. Ferguson
Chairperson
Senior Vice President, Research
Insurance Institute for Highway Safety

Dr. Jeffrey S. Augenstein
Medical Director, William Lehman Injury Research Center
Miami University

Mr. Donald Bischoff
Consultant to the Alliance

Dr. Kennerly H. Digges
Director, Biomechanics and Safety Research
FHWA/NHTSA National Crash Analysis Center

Dr. Mark Edwards
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Mr. Timothy A. Hoyt
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Mr. Vernon Roberts
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Mr. Larry Schneider
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Dr. Joseph Carra
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continued

Mr. A. B. "Chip" Chidester, III
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