



GENERAL MOTORS NORTH AMERICA
Safety Center

June 29, 2000
USG 3535; Part 3

Mr. Stephen R. Kratzke
Associate Administrator for
Safety Performance Standards
National Highway Traffic
Safety Administration
400 Seventh St., S.W.
Washington, D.C. 20590

NHTSA-00-7013-30

Subject: General Motors Corporation Supplemental Comments to Docket 99-6407; Notice 1, regarding Supplemental Proposed Rulemaking to require Advanced Air Bags.

Dear Mr. Kratzke:

Enclosed are supplemental comments of General Motors Corporation (GM) in response to the Supplemental Notice of Proposed Rulemaking (SNPRM) in Docket 99-6407; Notice 1. The notice, which appeared in the Federal Register on November 5, 1999, requests comments to supplemental proposed rulemaking to upgrade the agency's occupant protection standard "to meet the twin goals mandated by the Transportation Equity Act for the 21st Century: improving protection for occupants of all sizes, belted and unbelted, in moderate to high speed crashes; and minimizing the risks posed by air bags to infants, children, and other occupants, especially in low speed crashes."

The General Motors comments to the notice (USG 3535, dated December 22, 1999) included this passage:

GM generally agrees with the sunvisor label proposal but does request a change. Some manufacturers may use suppression systems that provide information to occupants so that they can respond appropriately. This information may be in addition to the proposed air bag suppression status light. For example, suppression systems may have status lights that indicate whether the passenger bag will deploy. If the lights indicate the bag will deploy even though a rear-facing child seat is installed, then the child and child seat should be relocated.

A point-of-use instruction may help to encourage the appropriate response to the system information and the visor label may be a good place for a point-of-use instruction. NHTSA should give manufacturers the option to provide that instruction on the visor label.

The agency's Final Order in Docket No. NHTSA 00-7013; Notice 1, published in the Federal Register on May 12, 2000, at 65 F.R. 30680, contained these comments in the Preamble:

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A few commenters wanted additional information added to the label related to specific issues with advanced air bags. GM wanted the option of adding instructions to inform users how to properly behave depending on whether the air bag was active or inactive. NTSB wanted to require information on what actions to take if the telltale is not illuminated. CAS suggested that information should be added explaining how belt use affects performance. Because these types of information are very design specific, we are not changing the warning label to address these comments. However, we are modifying the existing prohibition against other information on the sun visor to allow manufacturers the option of adding information, on a separate label, if they believe it is desirable to supplement the owner's manual information.

(65 F.R. 30722-3)

We would note that the Center for Auto Safety (CAS) comments do not ask the agency to permit an additional label but do urge that certain important safety information be provided for the motoring public. The relevant portion of the Center's comments is:

NHTSA should adopt additional language that informs the driver and occupant of the advantages of using their seatbelts in a vehicle equipped with an advanced airbag system. A label that informs consumers that wearing a seatbelt will allow the airbag to deploy using a lower inflation rate will help convince many occupants to buckle up. Whatever language the agency adopts, the label should clearly convey the message that using the seatbelt can directly influence what level of deployment an individual will face in a collision. To achieve the goals of both increasing seatbelt use and ensuring public awareness of the continued risk of injury from airbag deployments, NHTSA and the industry should consider using the Air Bag Safety Campaign as a means of accomplishing this end.

We agree that the information regarding seatbelt use and the specific operation of an advanced air bag design is important safety information and should be made available to the motoring public. And, in its final rule, the agency has mandated that this important information be provided -- some of it on the "new" mandated label, and the rest of it is mandated to be in the vehicle owner's manual.

The National Transportation Safety Board did ask that the motoring public be given important safety information regarding the meaning of the advanced air bag telltale on the mandated label. The agency, in its final rule, has mandated that this important information be provided, but in the vehicle's owner manual.

Upon reflection, we think the relevant provisions of the final rule regulatory language published at 65 F.R. 30680 mandate the best way to provide this important information. As published, the regulatory language contains no provision, or update to the S4.5.1(b) (3) of the standard, that would permit a manufacturer to add an additional label regarding advanced air bags, in addition to the mandated one, on the sun visor or anywhere else inside the vehicle. Because we now believe that this mandated way is superior to our original suggestion, we therefore withdraw it. Given the circumstances described above, we are making no request that the agency now take any action. Instead, as noted above, we think the agency's actions a ready taken best resolve the issue.

We welcome the opportunity to discuss any aspects of our response with you or members of your staff. If there are any questions, please do not hesitate to contact Mr. John E. Kromrei (810/947-1735) of my staff, or Mr. Richard F. Humphrey (202/775-5071) of GM's Washington Office.

Sincerely,


C. Thomas Terry, Director
Safety Affairs & Regulations
Safety Center

cc: Docket 99-6407; 2 copies
Mr. Clarke Harper, NHTSA; 10 copies