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DEPT. OF TRANSPORTATION
DOCKETS

From: Steven.Jonas@vw.com
To: Harper, Clarke <NHTSA>
Date: 8/22/00 12:53PM
Subject: FMVSS 208 Final rule Questions

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Clarke,

In order to begin development testing we have some key questions on the test procedures. I am sure some of these may already have been asked by others so maybe they have already been answered, but please tell me if you can give us any guidance on the points or if we need to submit a formal request for interpretation, in which case we would like to know how quickly we can expect to get an answer.

1. I have one question which hopefully you can answer because I think its a point of clarification rather than interpretation:

In the low risk deployment option the air bag is deployed at the level determined in S 22.5, using a 16 mph test with an unbelted 50th percentile male dummy. The purpose of the 16 mph test is to determine the air bag threshold and since S22.4 of the SNPRM did not specify use of a dummy in this test it was clear that injury criteria did not apply. However, because this test now must be conducted with the unbelted 50th male and from the language of S22.5 and the preamble (VIII.B.2.) it is not clear whether the 50th percentile male in the 16 mph test needs to meet any injury criteria.

Can you tell us whether the 50th percentile male in the S22.5 test needs to pass the injury criteria or do we need to submit a request for interpretation?

2. For the next two, I think Dietmar Haenchen already spoke to you but I would like to present the issues and request you to tell me how we can get the quickest answer.

a. In S 22.4.1.3, the plane C is located relative to the "geometric center" of the air bag tear seam. The question is how the geometric center is located in a non symmetrical shape such as a U shaped tear seam. Would it be the "center of mass" or inertia, in which case it would be toward the closed end of the U, or would it be the middle of the shape (taking the outer most horizontal and vertical edges and finding intersection of the mid points between the edges)?

b. In S 22.4.2.4 it provides for a dummy repositioning downward if the head contacts the windshield before the dummy Point 1 contacts the instrument panel. However it is not clear if after the dummy is moved downward, it is to be left at that position or moved forward (and downward if necessary) so that the Point 1 contacts the instrument panel while maintaining the clearance between the head and the windshield at not more than 5 mm.

Thank you.

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