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National Highway Traffic Safety Administration
Docket Management
Room PL-401
400 Seventh Street, S.W.
Washington, DC 20590

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**Re: Docket No. NHTSA 2001-8677; Notice 1 - 36
Advance Notice of Proposed Rulemaking, Early Warning Reporting**

Dear Sir or Madam:

These comments are submitted on behalf of The Torrington Company in response to the *Federal Register* request for comments published January 22, 2001, concerning the ways that the National Highway Traffic Safety Administration (NHTSA) may implement the "early warning reporting requirements" of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act. The Torrington Company objects to NHTSA's interpretation of the TREAD Act's (P.L. 106-414) reporting requirements for manufacturers of motor vehicle equipment.

The Torrington Company is one of the nation's leading broad-line manufacturer of bearings for industrial and defense use. The company manufactures over 15,000 part numbers, employs over 10,000 workers at more than a dozen US factories and is an international concern with facilities in more than 11 countries. In addition, The Torrington Company produces a variety of precision motion control components and assemblies. These unique products are sold to the automotive and industrial markets worldwide. Torrington special components and assemblies provide significant value by solving application problems and improving unit design and performance.

A specific automotive component manufactured by Torrington is a steering intermediate shaft assembly. The steering intermediate shaft assembly is a significant vehicle safety item that connects the steering column to the steering gear box. The primary function is to transmit torque reliably through angles while dampening noise, vibration and harshness from the driver. Another key function is to enhance occupant safety through the use of energy management features. These allow the vehicle to conform to government and industry collision safety regulations.

GREENBERG TRAURIG, LLP

800 CONNECTICUT AVENUE, N.W. SUITE 500 WASHINGTON, D.C. 20006

202-331-3100 FAX 202-331-3101 www.gtlaw.com

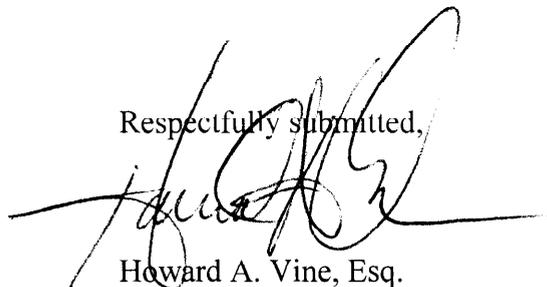
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The Torrington Company is extremely concerned with the NHTSA's interpretation of the TREAD Act's (P.L. 106-414) reporting requirements for manufacturers of motor vehicle equipment. As noted in the ANPR, there are approximately 14,000 individual items of original equipment in a contemporary passenger car. Many of these items, as in the case of Torrington's manufactured steering assemblies, are not supplied directly to the vehicle manufacturer, but are incorporated into components assembled by a person other than the manufacturer of the part. These units are assembled by a supplier, often with components from various manufacturers. In many instances, defects in modular components arise as a result of faulty installation by the assembler or vehicle manufacturer. There, defect is far more likely to come to the direct attention of the vehicle manufacturer than the manufacturer or assembler of the component.

The Torrington Company designs intermediate steering shafts to meet the safety and performance requirements of passenger cars, light trucks and sport utility vehicles. In the unlikely event of defect, The Torrington Company strongly believes that all data concerning such original equipment should be reported to NHTSA **by the vehicle manufacturers** – not by the individual supplier. Again, defects often arise not as a result of faulty manufacturing but improper component installation and it is usually the vehicle manufacturer which receives the original and often only notification of defect.

The Torrington Company strongly agrees with the need to supplement 49 U.S.C. § 301 to require reports concerning defects in motor vehicles. However, the reporting requirements of P.L. 106-414 as interpreted by NHTSA place an unmanageable and deleterious weight of the reporting burdens on The Torrington Company in specific, and the vehicle equipment industry in general.

Respectfully submitted,



Howard A. Vine, Esq.
Counsel to The Torrington Company