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Docket Management Facility
U.S. Department of Transportation
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Washington, DC 20590-001

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Subject: Docket No. NHTSA-2004-17694; Federal Motor Vehicle Safety Standards; Side Impact Protection; Side Impact Phase-In Reporting Requirements

TRW Vehicle Safety Systems Inc. (TRW) and its associated worldwide subsidiary companies in the occupant restraints business are pleased to present to NHTSA comments regarding the Notice of Proposed Rulemaking to change FMVSS 214. TRW believes the enhanced occupant protection potential provided by the expanded application of the head protection features included in seat mounted side impact air bags and roof mounted side curtains, will result in substantial reductions in injuries and/or their severity during side collisions.

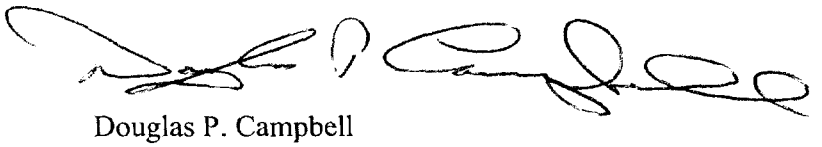
As NHTSA is aware, the Alliance of Automobile Manufacturers (AAM) has already undertaken a voluntary initiative to upgrade occupant protection in the event of a side impact. TRW believes the AAM initiative, with its IIHS MDB and FMVSS 201 pole test configurations, could drive expanded application of side impact protection with possible earlier timing than that proposed by the NPRM. In fact, the NPRM, which contains different test requirements than the AAM proposal, may delay actions that would have occurred in order to meet the AAM proposal. TRW believes that in the case of either the AAM initiative or the NPRM, the technology exists to meet the proposed performance requirements within the proposed implementation timeframes. Over the last several years, TRW has designed and installed manufacturing capacity to build side impact air bag and curtain modules for a substantial portion of the European vehicle market, which today has a significant penetration of these technologies. Virtually all vehicle programs in which TRW participates in Europe have side impact head protection features. TRW is prepared to respond to the needs of either the AAM initiative or the NPRM in a similar fashion for the North American market and does not foresee any substantial issues meeting the timing for either initiative. TRW has planned North American capacity for all necessary technologies to support these initiatives, including bag weaving, inflator manufacture, and module assembly.

In principle, TRW supports the requirements outlined in the NPRM. The addition of the oblique pole test, along with the added requirement for testing with a 5th percentile female dummy in the full-forward seating position, may lead to broader coverage of the occupant compartment by the side impact protection system. TRW sees no major issues with the various test conditions for impact velocity, angle, and barrier/pole configuration contained in the NPRM.

TRW believes the addition of HIC standards is a positive step. However, TRW cannot, at this time, comment on the head or thoracic injury criteria proposed in the NPRM, due to the absence of significant test data on the proposed SID IIs FRG and ES-2re ATDs. TRW could only comment on the potential of its restraint technology to meet the proposed injury criteria after sufficient time has elapsed to allow the industry to gain experience with these new ATDs. This factor could lead to potential delays in the implementation of the NPRM. On the other hand, the AAM initiative incorporates injury criteria based on known and accepted ATDs, which are readily accessible to enable the development of vehicles and protection systems which could meet their voluntary standards in a potentially faster timeframe.

Regarding OOP performance, TRW believes that side protection systems designed to meet the NPRM could have acceptable performance in OOP situations. TRW supports the TWG initiatives for evaluating OOP performance and foresees no need for regulatory activity in this area.

Sincerely,



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