

Docket 19054

My concerns are in line with a recent (10-15-2004) Newsweek article in which a certain prominent consumer electronics company stated that they realize that 80% of the general population is incapable of successfully operating many components they sell and this causes a high rate of returns to retail outlets. Their goal is simplify their products so a larger percentage of the population will not be confused or intimidated by their products thus gaining a greater market share. But, realistically they're not targeting 100% of the population. People who can't figure out how to use their products simply won't buy them or they'll return them. But, then again their products do not hold life and death in the balance. This is not the case with TPM'S on motor vehicles.

The statement in section S4.2 on page 55924, exemplifies a clear goal of 100% simplicity and ease of use by stating that the low tire pressure warning telltale should illuminate anytime pressure in any of the vehicle's tires are below a threshold and the telltale must be extinguished after the inflation pressure is corrected.

My mother owns a vehicle equipped with an ABS based TPMS and she is certainly incapable of understanding the nuances of this system. After picking up a nail in her rear passenger tire her low tire pressure indicator came on and she made her way to the closest gas station. Since she didn't have a gauge she filled the rear tire until it looked about the same as the front passenger tire. Since the front tire is squashed more than a rear tire due to the additional engine weight I feel certain that she refilled the tire with a woefully inadequate amount of pressure. Fumbling through the vehicle owner's manual she was able to clear the indicator or reset the TPMS with an insufficient amount of tire pressure. A couple of weeks later the low tire pressure indicator came on again. She made her way home where she visually inspected the tire in question and decided that it looked okay and reset the TPMS again. At this point I fear that the tire pressure was below a reasonable safety level. Some weeks later the rear passenger tire disintegrated (without warning) during an extended five-hour trip to her friend's house causing my mother to lose control of the vehicle. Luckily my mother was not seriously injured but she was stranded out in the middle of no-where for two hours.

I feel this accident was directly a result of her TPM system's failure to recognize that the tire was not properly refilled. The wording in S4.2 clearly states that low tire pressure indicator should remain on until the tire pressure is corrected. It is my understanding and my experience that the ABS based TPM's cannot measure tire pressure and I wholly support this requirement as a critical part of the impending law.

Unlike a consumer electronic item, this tire safety law will save lives and prevent injuries. This in itself requires that 100% of the population can use it with no misunderstanding. Light on. Light off. It doesn't get any simpler than that. Even my mother without a gauge can refill a tire until the light turns off.