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National Transportation Safety Board

Washington, D.C. 20594

Office of the Chairman

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Dear Sir/Madam:

The National Transportation Safety Board (NTSB) has reviewed the National Highway Traffic Safety Administration's (NHTSA's) request for comment titled, "Event Data Recorders," published in the *Federal Register*, Volume 67, Number 198, on October 11, 2002. The Safety Board appreciates the opportunity to comment on this important issue affecting highway safety.

The Safety Board has a long history of promoting on-board recorders in all modes of transportation. In fact, the issue of automatic information recording devices for all modes of transportation has been on the Board's "Most Wanted" list of Transportation Safety Improvements since 1997. On-board recording devices have proven themselves to be extremely valuable in the other modes of transportation, particularly aviation. The Board believes effective implementation of on-board recording in highway vehicles can have a similar, positive impact on highway safety. Accurate recorded data can provide key information to help individual accident investigations. Also, the collection of recorded data in aggregate form can offer a wealth of information when addressing important safety issues, such as air bag system effectiveness. Even further, standardization of event data recorder (EDR) data could increase the benefit of collecting data in aggregate form.

The Safety Board's first recommendation to NHTSA regarding the on-board recording of data resulted from the 1997 NTSB Air Bag Forum. Safety Recommendation H-97-18 recommended that NHTSA work with the automobile industry to use data stored in current crash sensing and recording devices to gather better information on crash pulses and other crash parameters. The subsequent initiative by NHTSA and automobile manufacturers, such as General Motors, went beyond the Board's expectations. The Board is further encouraged by the efforts of some members of the automobile industry to continue to expand the recording capabilities of air bag modules.

As mentioned in the request for comment, the Safety Board's most recent Safety Recommendations to NHTSA regarding on-board recorders were H-99-53 and -54. These recommendations requested that installation of EDRs be required on newly manufactured school

buses and motorcoaches and that NHTSA work with industry to develop an EDR standard. For the development of a standard, the Board focused on key issues that have been critical to on-board recording standards in other modes of transportation: parameters to be recorded, data sampling rates, duration of recording, and survivability factors.

The Safety Board believes NHTSA's ongoing leadership in response to the Board's recommendations has been invaluable to the implementation of EDRs. NHTSA's formation of two working groups, the Event Data Recorder Working Group and the Truck and Bus Event Data Recorder Working Group, brought together a number of different manufacturers, user groups, and other stakeholders. The Board participated in both of the NHTSA EDR working groups and found that the efforts of these groups were an important first step in the effective implementation of EDRs.

The Safety Board's investigations have already benefited from the availability of on-board recorded data from such devices as engine electronic control modules. The impact that recorded data can have on an accident investigation is no more evident than in the Board's investigation of the Sierra Trailways motorcoach accident that occurred in Canon City, Colorado, on December 21, 1999. Investigators were fortunate that the motorcoach engine's electronic control module recorded information, though limited, that assisted the investigation. However, despite the important contribution the data made to the investigation, investigators were still left with many unanswered questions regarding the status of the vehicle systems and the actions of the driver. If the motorcoach had been equipped with an EDR that recorded the parameters recommended by the Board in H-99-54, investigators would have been able to more clearly identify the status of the vehicle and the driver's actions, and more focused safety recommendations may have resulted.

In 1998, the Safety Board issued Safety Recommendations H-98-23 and -26 to trucking industry organizations, recommending that they advise their members to equip their vehicles with on-board recording devices to gather information on both driver and vehicle operating characteristics. These recommendations focused on two issues. The first issue was the recording of driver data for the purpose of hours of service compliance, which was outside the scope of an EDR. The second issue focused on the recording of vehicle information, as with an EDR. Unfortunately, the trucking industry groups did not choose to take the recommended action, and the recommendations have been classified as "Closed-Unacceptable Action." The Safety Board is disappointed that no action was taken for the recording of vehicle data and continues to believe the recording of data on board heavy vehicles remains an important issue.

The formation this past year of the P1616 Working Group by the Institute of Electrical and Electronic Engineers, Inc. (IEEE), is another promising step in the implementation of EDRs. The Safety Board fully supports the development of a voluntary standard and Safety Board staff are participating in the working group. The Board hopes that the standard developed through IEEE will provide a framework to promote consistency and availability of EDR data for both light and heavy vehicles.

The Safety Board believes EDRs continue to be a key component in the process to improve highway safety. The issues associated with EDR development and deployment will be

an important part of a Topical Technical workshop (TOPTEC), being co-sponsored by the Safety Board and the Society of Automotive Engineers. The TOPTEC will focus on recorders in all modes of transportation and is expected to take place June 4-5, 2003, in Alexandria, Virginia. The Board will keep NHTSA informed as the details are finalized. We hope that NHTSA will actively participate in this effort.

We appreciate the opportunity to comment on this important issue and urge NHTSA to continue pursuing the effective implementation of EDRs on highway vehicles.

Sincerely,

John Hammerschmidt

John A. Hammerschmidt
Acting Chairman