

INSURANCE INSTITUTE FOR HIGHWAY SAFETY

DEPT. OF TRANSPORTATION
DOCKET SECTION
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September 17, 1998

The Honorable Kenneth R. Wykle
Administrator
Federal Highway Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

**Parts and Accessories Needed for Safe Operation;
Lighting Devices, Reflectors, and Electrical Equipment**

Notice of Proposed Rulemaking

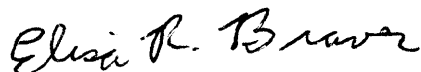
Docket No. FHWA MC-94-1; FHWA-1997-2222_ 328

Dear Administrator Wykle:

The Federal Highway Administration has proposed that truck trailers manufactured prior to December 1, 1993 be retrofitted with conspicuity treatments conforming to those specified in Federal Motor Vehicle Safety Standard (FMVSS) 108 for trailers manufactured after that date (63 FR 33611). The Insurance Institute for Highway Safety strongly supports this proposed amendment. Enactment should lead to significant reductions in deaths, injuries, and property damage from vehicles striking the sides and rears of older truck trailers not covered by the conspicuity requirements of FMVSS 108. It has been estimated that the proposed rule would prevent about 260 deaths, 4,200 injuries, and 5,300 property-damage-only crashes during a 10-year period.

The Institute also supports extending the benefits of enhanced conspicuity to older truck tractors and is petitioning the Federal Highway Administration in a separate letter to initiate appropriate rulemaking.

Sincerely,



Elisa R. Braver, Ph.D.
Senior Research Analyst

cc: Docket Clerk, Docket No. FHWA MC-94-1; FHWA-1997-2222

INSURANCEINSTITUTE FOR HIGHWAY SAFETY

September 17, 1998

The Honorable Kenneth R. Wykle
Administrator
Federal Highway Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

**Petition to Require Retrofit of Conspicuity Treatments
to Truck Tractors Manufactured Prior to July 1, 1997
49 CFR Part 393
Docket No. FHWA-1997-2222**

Dear Administrator Wykle:

The Insurance Institute for Highway Safety petitions the Federal Highway Administration (FHWA) to amend the Federal Motor Carrier Safety Regulations to require that truck tractors manufactured before July 1, 1997 be retrofitted with conspicuity treatments conforming to those specified in Federal Motor Vehicle Safety Standard 108 for the rears of truck tractors manufactured after that date.

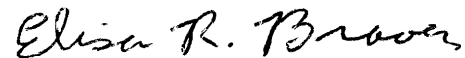
In the August 8, 1996 final rule for truck tractor conspicuity (61 FR 41355), the National Highway Traffic Safety Administration (NHTSA) estimated that 260 collisions could be prevented and another 782 mitigated per year once the entire truck tractor population is equipped with rear conspicuity treatments. This, NHTSA estimates, could result in 4 to 7 fewer deaths and 94 to 157 fewer injuries annually. Retrofitting older truck tractors with conspicuity treatments will engender these benefits earlier than waiting for older truck tractors to be retired and replaced by those manufactured after July 1, 1997.

Using the NHTSA estimate that 95 percent of a truck tractor's vehicle-miles traveled occur in the first 15 years of operation, the greatest net benefit may be achieved by applying the retrofit requirement to a limited number of model years prior to 1997 (NHTSA, 1995). For example, model years 1992-96 may be a reasonable target population for tractor retrofits.

Kenneth R. Wykle
September 17, 1998
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The Institute strongly supports FHWA's proposal to require conspicuity treatments for older truck trailers, and FHWA should act to extend the benefits of improved conspicuity to older truck tractors as well.

Sincerely,

A handwritten signature in cursive script that reads "Elisa R. Braver".

Elisa R. Braver, Ph.D.
Senior Research Analyst

cc: Docket Clerk, Docket No. FHWA-1997-2222

Reference

National Highway Traffic Safety Administration. 1995. Preliminary Regulatory Evaluation: Retroreflective Conspicuity Material on the Rears of Truck Tractors, FMVSS 108. Washington, DC: Office of Regulatory Analysis, Plans and Policy.