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Nicole R. Nason, Administrator National Highway Traffic Safety Administration 1200 New Jersey Avenue, SE Washington DC 20590

Dear Ms Nason,

Subject: Final Rule, Response to Petitions for Reconsideration, Technical Amendment, Docket No. 2008-0111, Anthropomorphic Test Devices; ES-2re Side Impact Crash Test Dummy 50th Percentile Adult Male.

First Technology Safety Systems (FTSS) has reviewed the February, 2008, ES-2re dummy drawing package (identified in the above mentioned technical amendment) and we have identified a number of drawing errors and a number of drawing issues. We seek to petition NHTSA to correct these drawings to ensure that the ES-2re dummy continues to meet the same dimensional and performance requirements established for the dummy when the dummy was proposed for inclusion into 49 CFR Part 572 Subpart U. FTSS makes the following comments and recommendations with respect to the drawing package. A marked up drawing for each of these recommended changes are attached to the end of this letter.

- 1) Drawing 175-1011, Top Plate UNLC Blank. Fix typographical errors for dimensions, MØ5.0, MØ6.0, MØ6, and MØ2.5. Eliminate the Ø symbol.
- 2) Drawing 175-3502, Pivot Stop Plate, Left. Fix typographical error on Note #4. Replace RH with LH since this is a left hand part.
- 3) 175-6006, Pubic Symphysis Structural Replacement. There is a Part Mark located at the center of the part. This Part Mark is not defined. FTSS recommends that the Part Mark be clarified or removed altogether from the drawing.
- 4) Drawing 175-6012, Hip Pivot Pin. FTSS believes that dimension "16.994 +0.000 / -0.011" is a typographical error and should be dimensioned as "16.990 +0.000 / -0.011". The Hip Pivot Pin mates to part number 5000110 (Ball Bearing) – which has an ID dimension of 17.000 +0.000 / -0.008 (vendor specification). The bearing at a nominal dimension of 16.992 would not allow a Hip Pivot Pin at its maximum diameter of 16.994 to fit within the bearing.
- 5) Drawing 175-6010, Iliac Wing Assembly, Left. Fix typographical error for drawing dimension "17.0556". This dimension should be "17" since it is not reasonable to control and measure this molded part to four decimal places and "17" also matches the same dimension as the Iliac Wing Assembly, Right (NHTSA Drawing 175-6002). FTSS also recommends that the drawing dimension "Ø20.03" be replaced with "Ø20.03 ± 0.10" since this dimension cannot be controlled to a tolerance of ± 0.05. We also recommend the addition of dimension "R0.5" to better define this location for easier machining of this particular section of the part and to prevent breakage due to concentrated stresses.

- 6) Drawing 175-6063, Femur Bearing Plate, Left. Fix typographical errors for drawing dimensions 17.5000 ± 0.0001" and "48.3000 ± 0.0001". The tolerances are too tight to reasonably achieve at four decimal places and would add unnecessary expense when making the part. FTSS recommends that these dimensions should be specified as "17.5 ± 0.5" and "48.3". These recommended dimensions would also match the existing dimensions on the Femur Bearing Plate, Right (NHTSA Drawing 175-6068).
- 7) Drawing 175-6068, Femur Bearing Plate, Right. Fix typographical errors by removing the parenthesis from around dimensions "(48.3)" and "(17.5 ± 0.5)". This will maintain consistency between NHTSA Drawings 175-6068 and 175-6063.
- 8) Drawing 175-6002, Iliac Wing Assembly, Right. FTSS recommends that the drawing dimension "Ø20.03" be replaced with "Ø20.03 ± 0.10" since this dimension cannot be controlled to ± 0.05. We also recommend the addition of dimension "R0.5" to better define this location for easier machining of this particular section of the part and to prevent breakage due to concentrated stresses.
- 9) Drawing 175-2003, Plate, Neck Head & Torso Interface. FTSS recommends that NHTSA part number 5000049 Helicoil, M6 x 1 x 6, be replaced with part number 5000729 Helicoil M6 x 1 x 4.5 because the 5000049 Helicoil is too long and may not sit below the machined surface due to stack up tolerance of parts. FTSS also suggests the addition of dimension "4X R3.2 To the Surface" on Detail Z in order to clarify the dimension.
- 10) Drawing 175-3000, Shoulder Assembly. FTSS recommends that NHTSA part number 5000014 SHCS, M6 x 1 x 35, be replaced with part number 5000008 SHCS, M6 x 1 x 30 because the 5000014 SHCS is too long to properly secure the assembled parts. The M6 x 1 x 35 SHCS is supposed to secure the Shoulder Top Plate (175-3008) to the Shoulder Spacer Block (175-3002). However, the Shoulder Top Plate has a material thickness of 8 mm and the Shoulder Spacer Block has a material thickness of 25.5 mm. Together, the overall thickness of the combined parts is 33.5 mm which is 1.5 mm shallower than the length of the 35 mm long SHCS. This will create a condition where the 35 mm SHCS will not clamp the parts properly. A M6 x 1 x 30 SHCS will provide a 3.5 mm clearance to the bottom of the threaded holes on the Shoulder Spacer Block and is therefore an appropriate fastener for this application.
- 11) Drawing 175-3011, CAM Buffer Pad. FTSS has noted that the current dimensions for this part have tolerances that are too tight to accurately control a molded part. We recommend that the NHTSA drawing dimensions: " \emptyset 5.0", "90.0", "5.0", and "21.2 ± 0.2" be replaced with these dimensions: " \emptyset 5", "90", "5", "21.2 ± 0.3".
- 12) Drawing 175-7058, Friction Plate Retaining Stud. FTSS believes that the Datum A tolerance of ".0003" for the perpendicular surfaces is unnecessarily tight at four decimal places. We recommend a tolerance of ".003" because the NHTSA tolerance is too tight to be reasonably measured and therefore accurately controlled. Furthermore, at tolerance of ".0003" would add unnecessary cost to the part.
- 13) Drawing 175-7085-1, Knee Flesh, Left. There is a note on the drawing that states: $\frac{1}{4}$ " OVER WIDTH "A" FOR 180°. But, "A" is not defined on the drawing. However, "A" is defined on the corresponding drawing 175-7085-2, Knee Flesh, Right. FTSS recommends that drawing 175-7085-1 be corrected to add a definition for "A" to match drawing 175-7085-2 which specifies that "A = $1 \frac{3}{4}$ ".
- 14) Drawing 175-7090-1, Thigh Molded, Left. Fix typographical errors for drawing dimensions "(2x ØØ24)" and "(2x Ø14)". These dimensions should be listed as "(2x Ø24)" and "(2x14)". Removal of extra or redundant Ø symbol is required. This would also make this part consistent with the Thigh Molded, Right drawing (NHTSA Drawing 175-7090-2).

- 15) Drawing 175-9013, Bearing. The drawing has a reference to Note#2 in the revision record (REV B), but the note is missing from the "NOTES" field. FTSS recommends that the note be added to the note field, or the note reference be eliminated from the revision record.
- 16) Drawing 175-9014, Pin Machined. Correct typographical error for missing revision indicator for REV B on the Material Reference. The revision record states "ADDED REF. TO MATERIAL SPECIFICATION"; however no revision reference bubble was added.
- 17) Drawing 175-9027, Lower Mounting Base. FTSS recommends that the following NHTSA dimensions "92.5 +0 / 0.2", "66.5 +0 / -0.2", and "4 x 6 x 45" be replaced with "91.4 +0 / -0.2", "66.0 +0 / -0.2", and "4 x 9.7 x 45" respectively. We recommend these changes due to the wider tolerances associated with typical product dimensions specified for the 3" x 4" tubular steel beam that the Lower Mounting Base fits into. These tolerances are typically ± 0.030 for the tubular beam so our recommended dimensional changes for the Lower Mounting Base is necessary to guarantee that the Lower Mounting Base will fit into the wide variety of pendulums beams in the marketplace.
- 18) Drawing SA572-S71-1, Lower Neck Load Cell Assembly. FTSS recommends that specification of the part weight be correct to include the weight of the two connector/cable assemblies. The weight currently specified for this part in the NHTSA drawing is "0.8 lb. / 0.36 kg MAX." However, this weight does not include the weight of the electrical connector/cable assemblies. Since the cables are hard wired to the load cell, they need to be included in the total weight. Therefore, we request that the assembly weight be listed as "0.93 lb. / 0.42 kg MAX" to include the two cable assemblies.

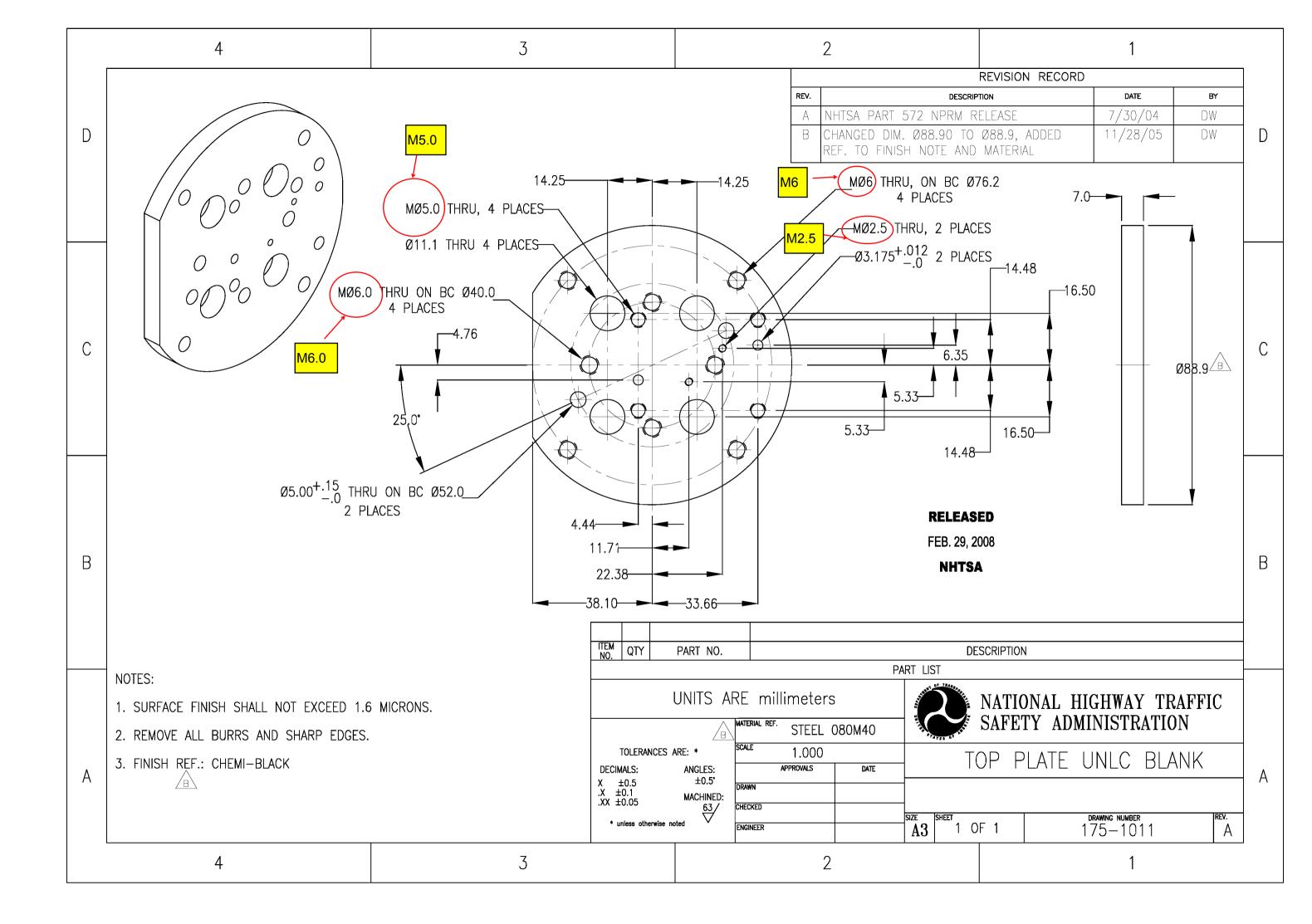
If you have any questions regarding these comments to the Final Rule, Response to Petitions for Reconsideration, Technical Amendment, please contact me at (734) 446-3132 or at <u>ibastian@ftss.com</u>.

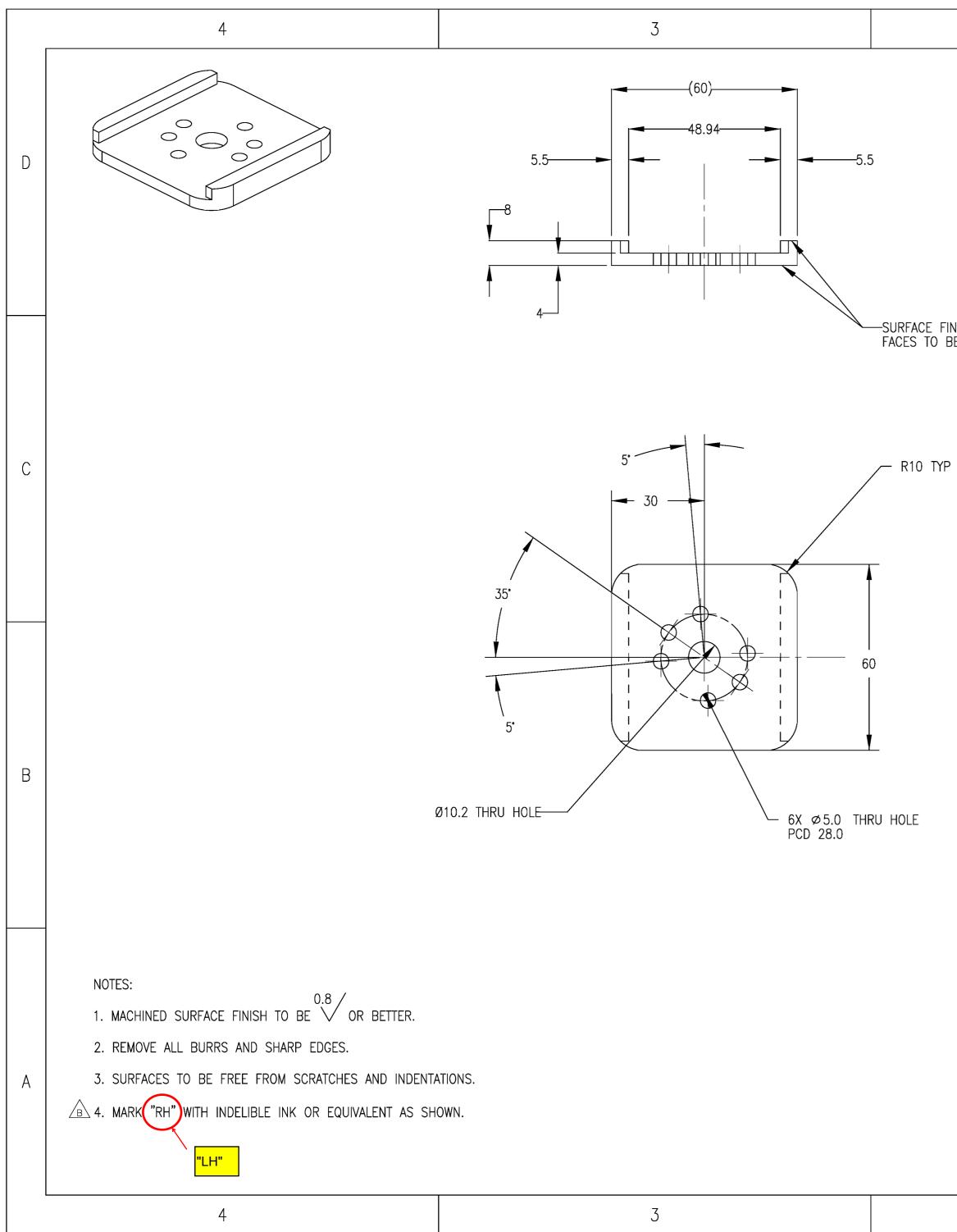
Sincerely,

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Joseph Bastian Engineering Manager First Technology Safety Systems, Inc

cc: Jerry Wang

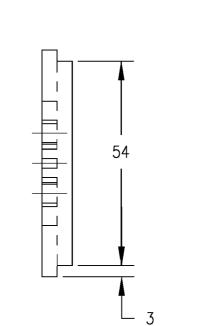


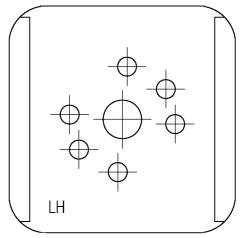


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В	ADDED REF. TO MATERIAL SPECIFICATION, REVISED NOTE #4	12/28/05	DW

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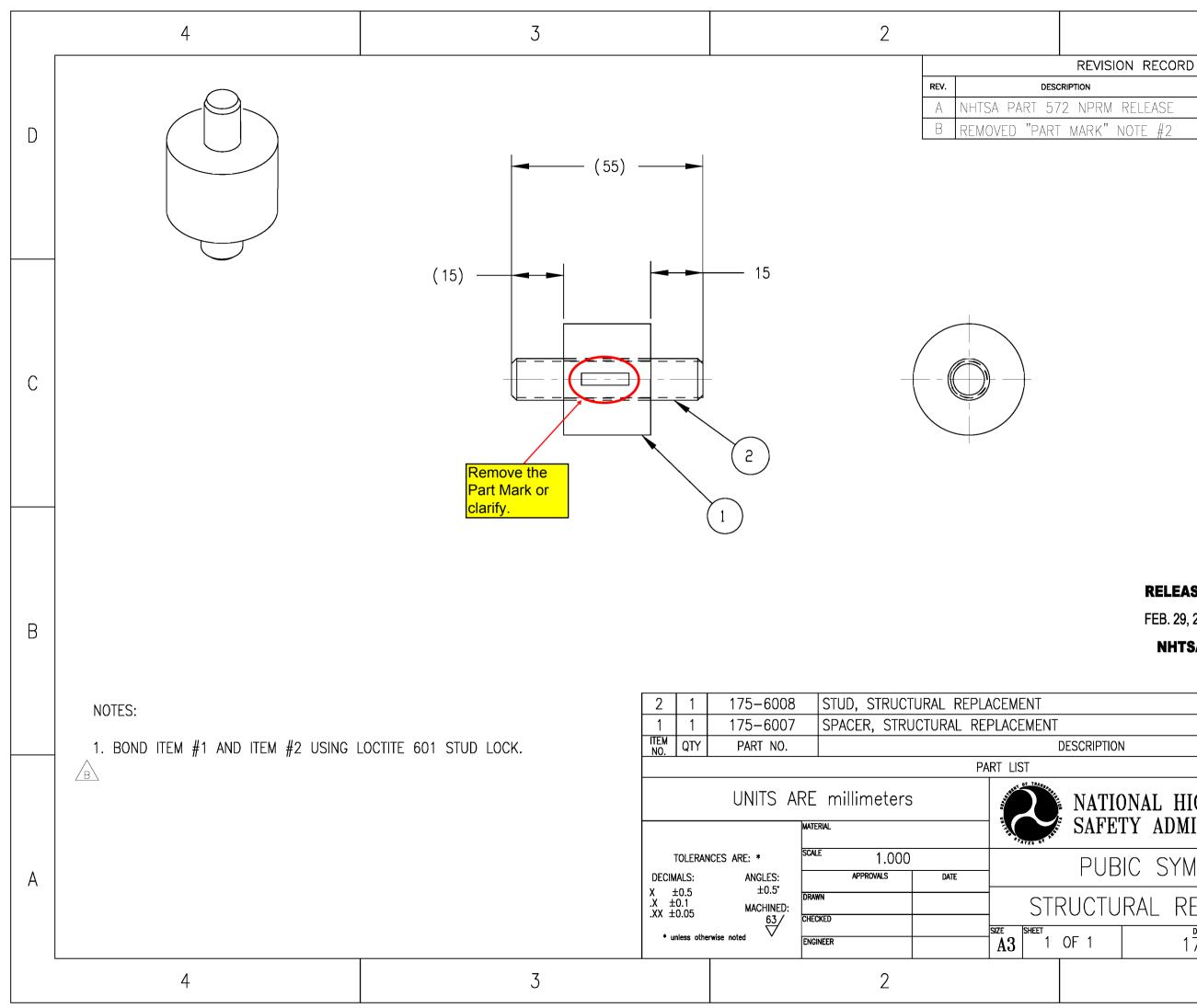
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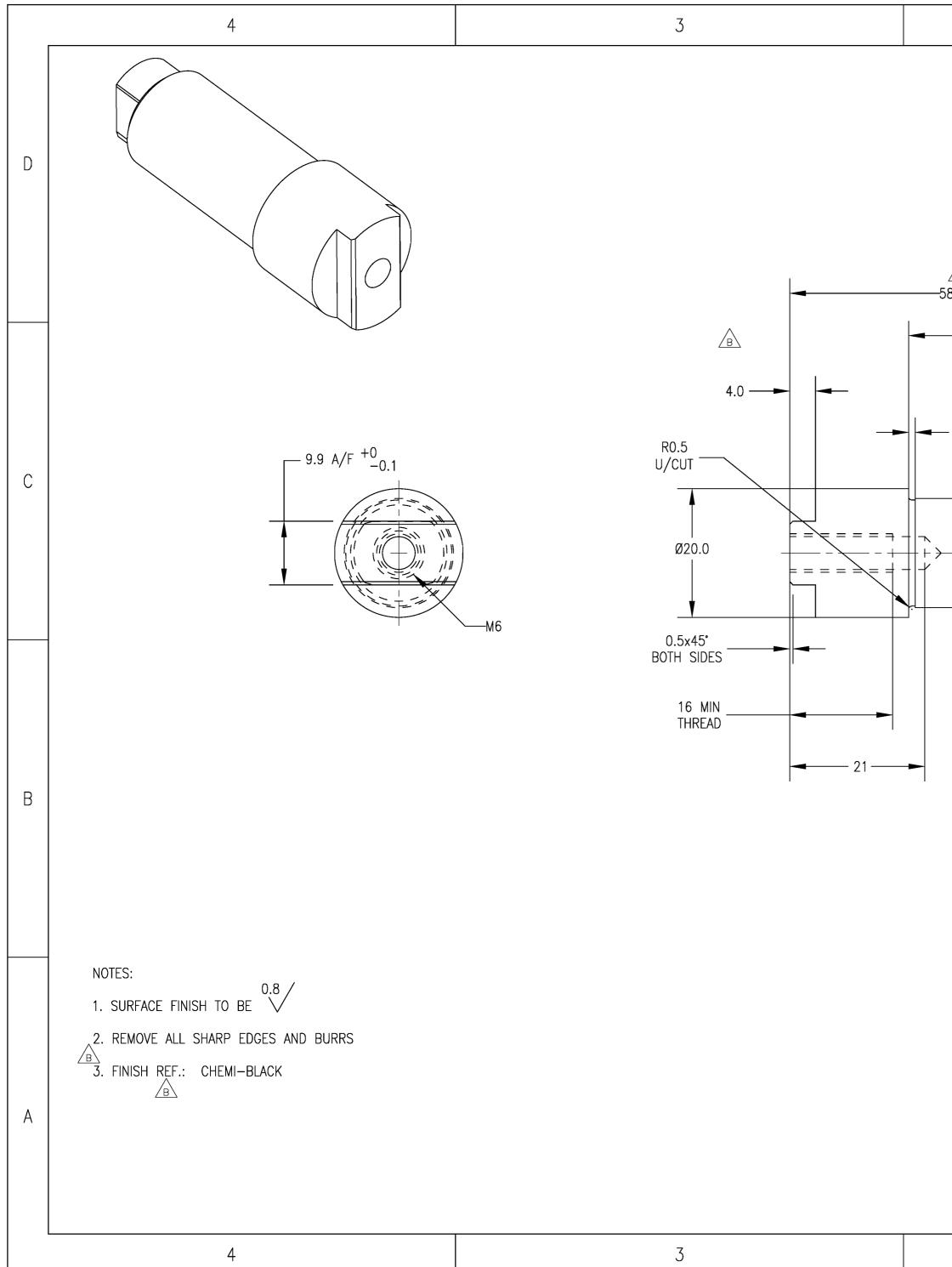
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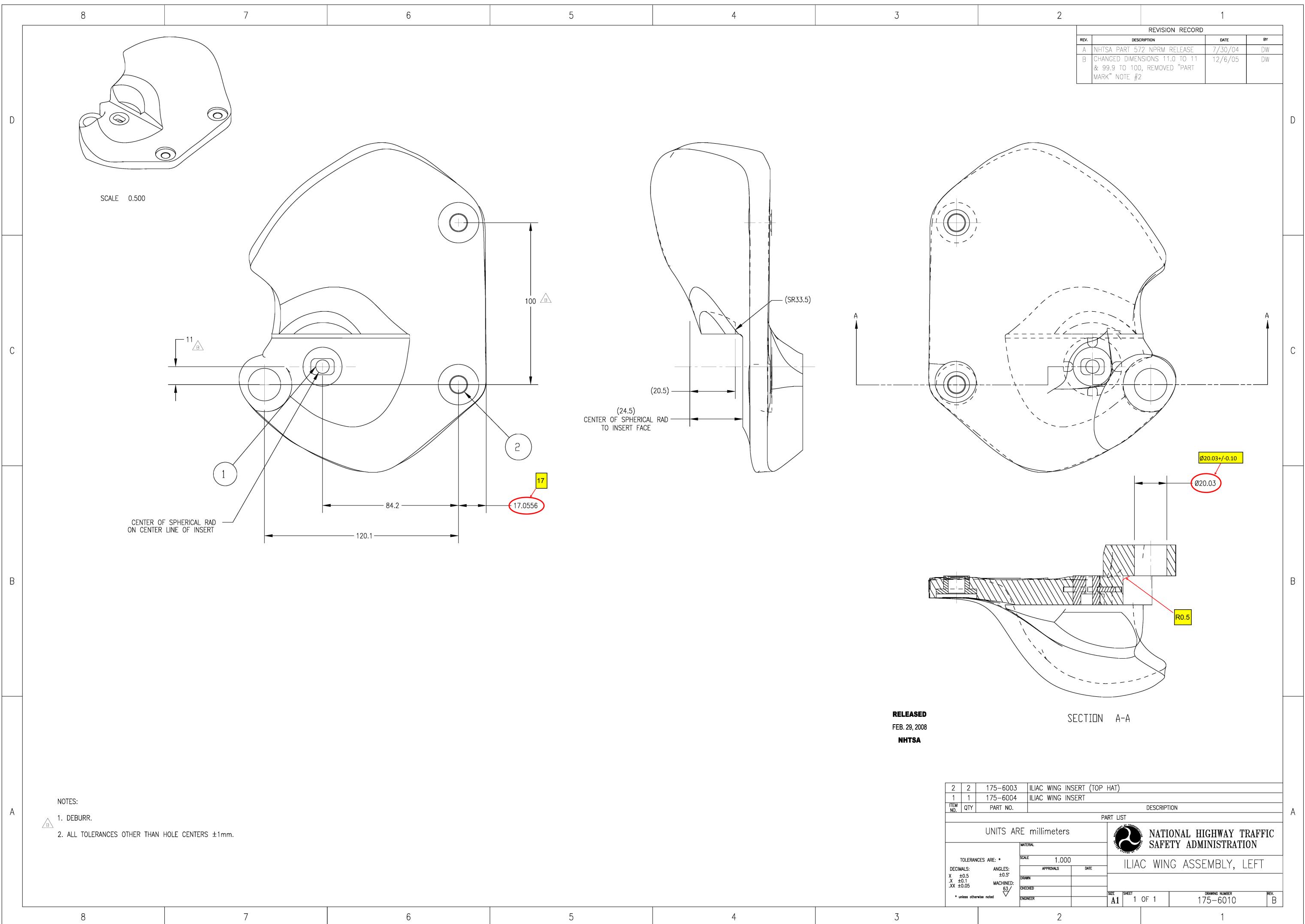
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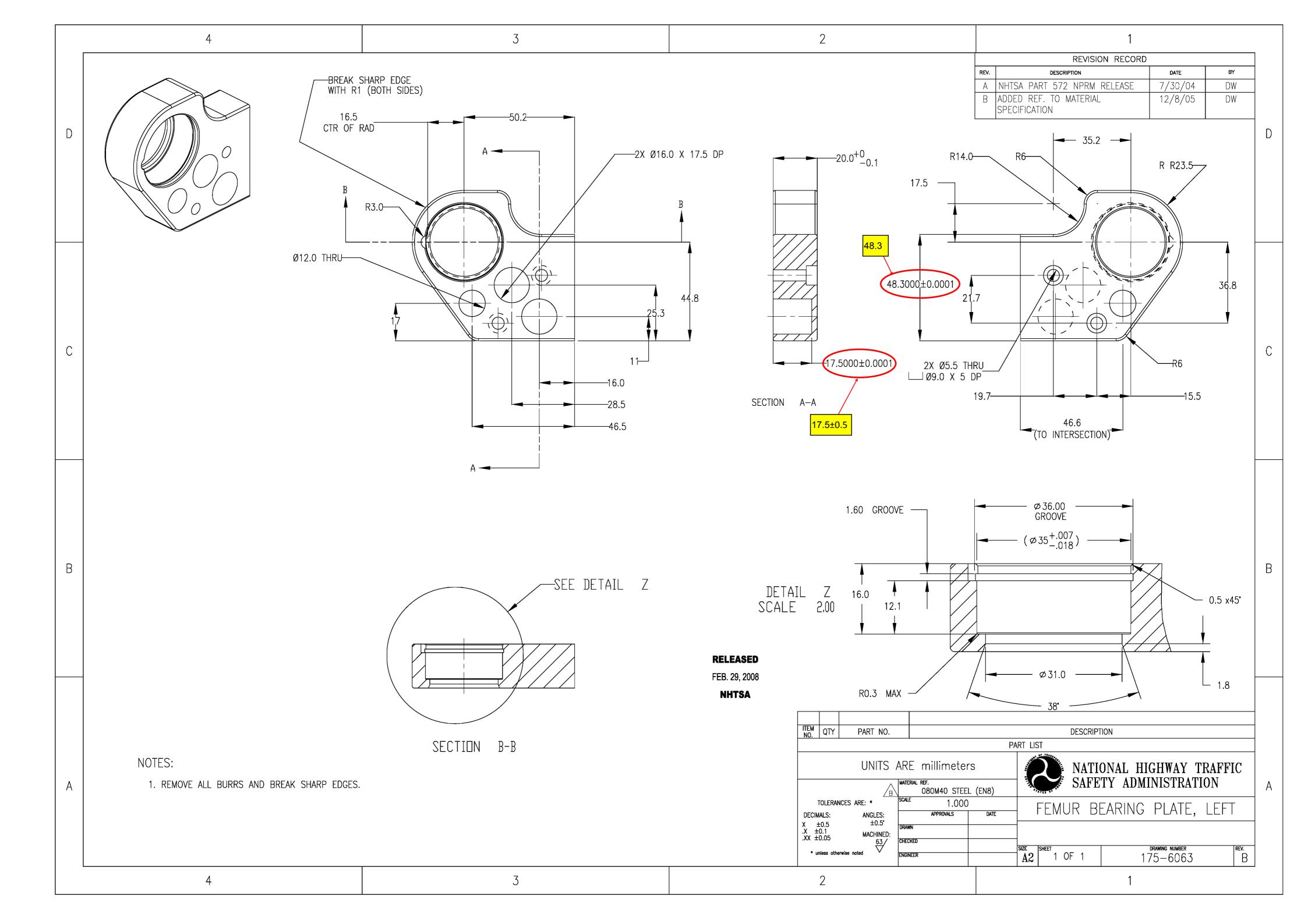
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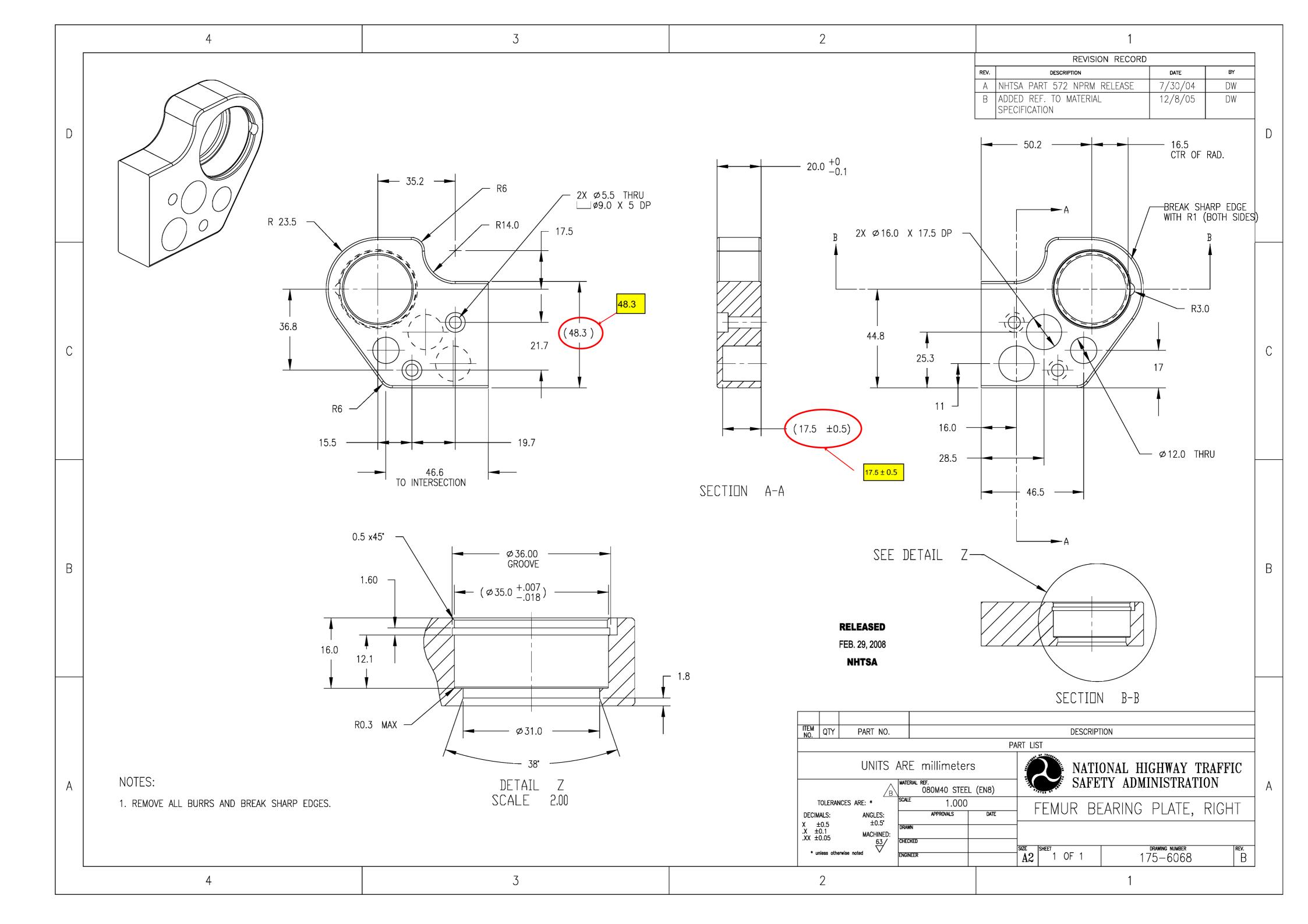


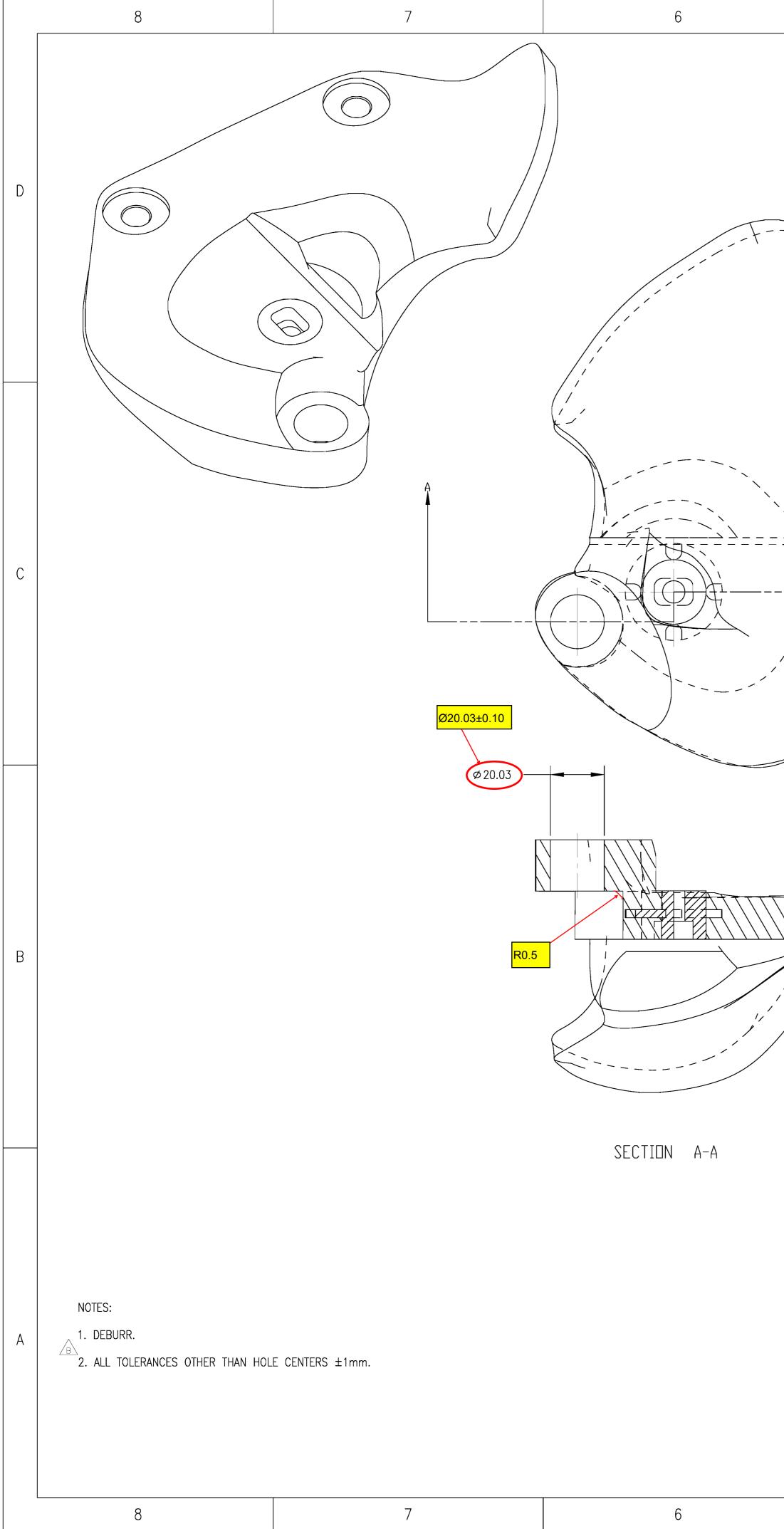
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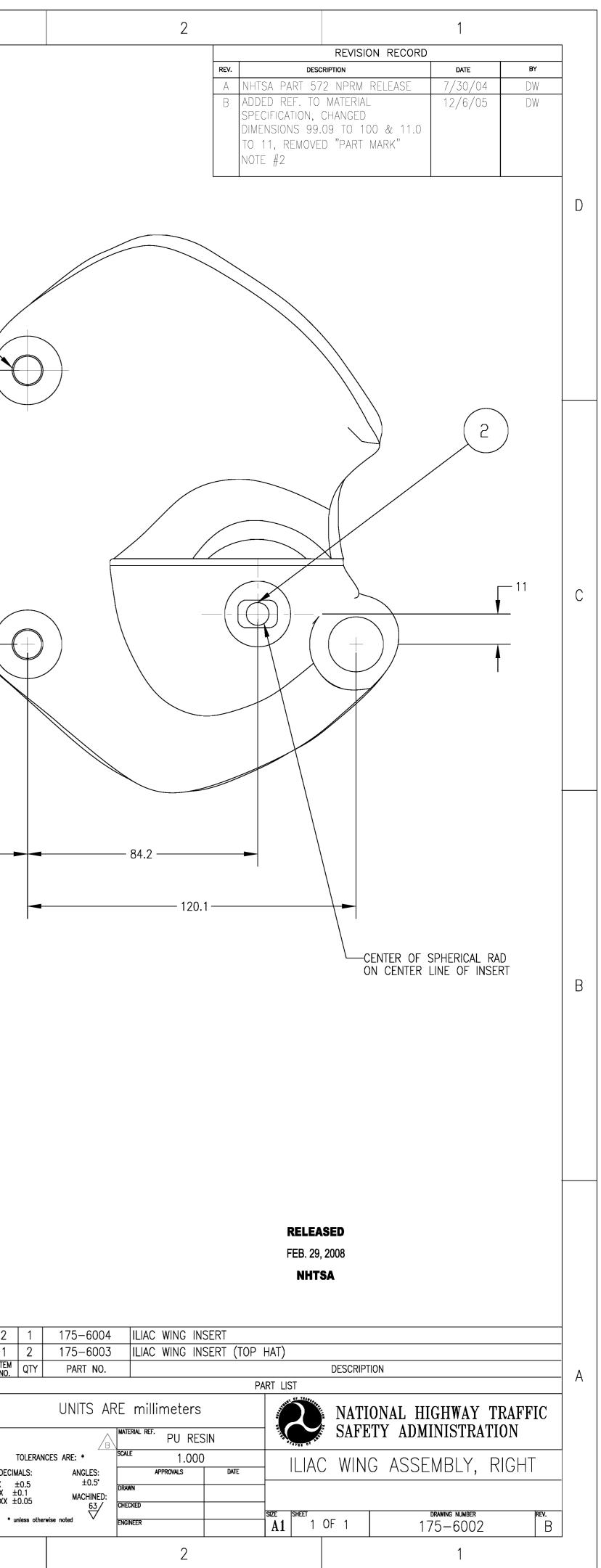


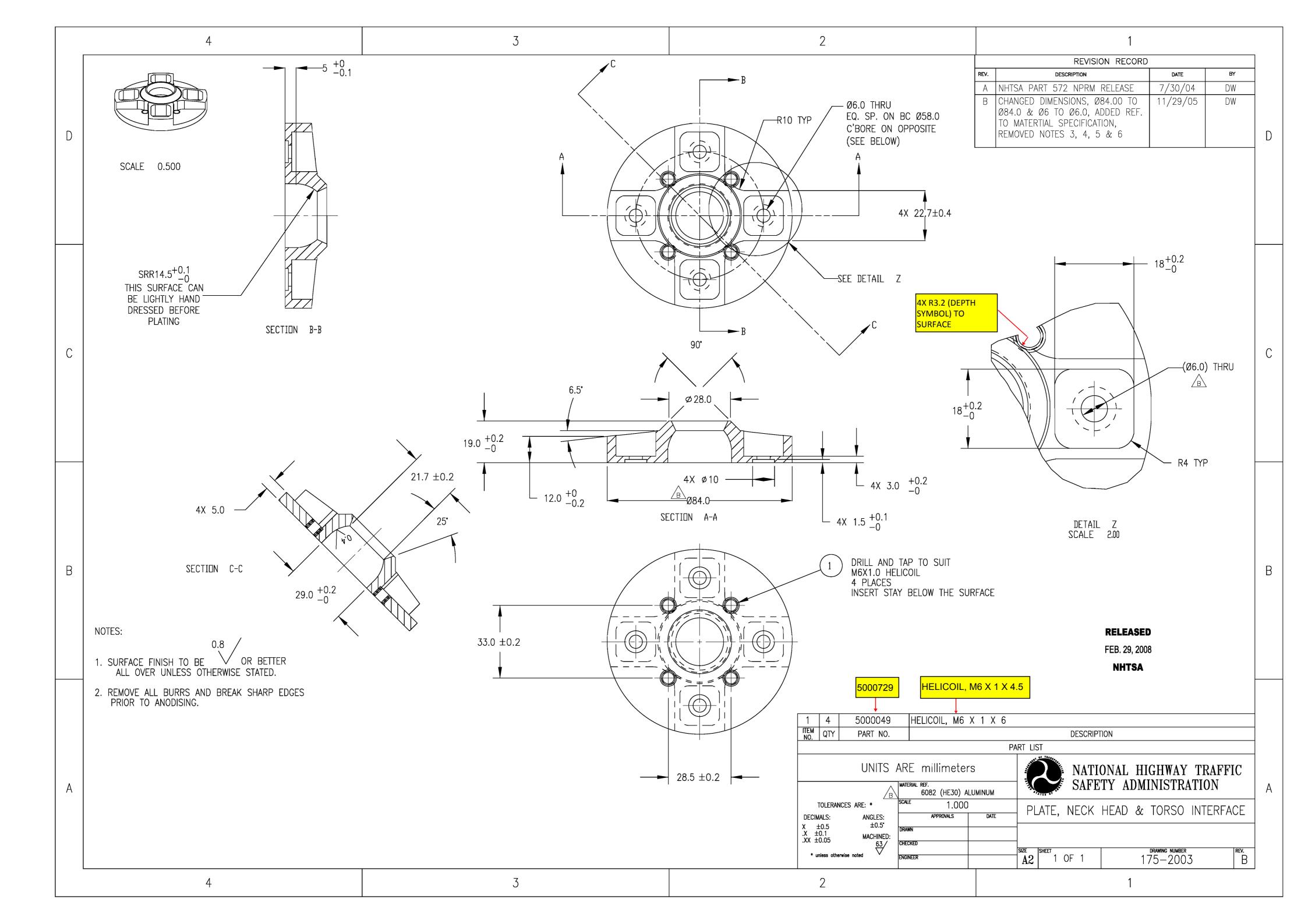


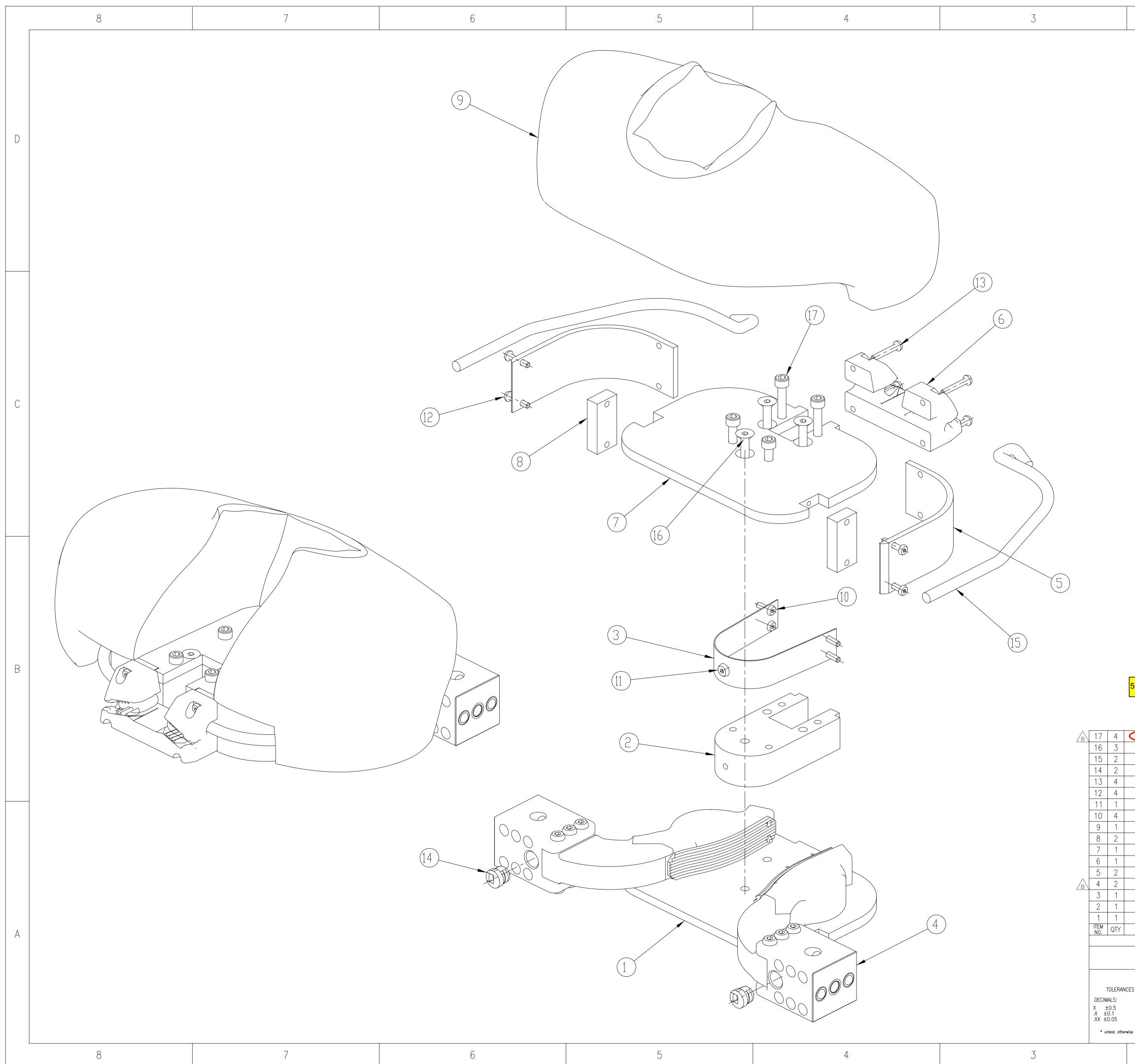


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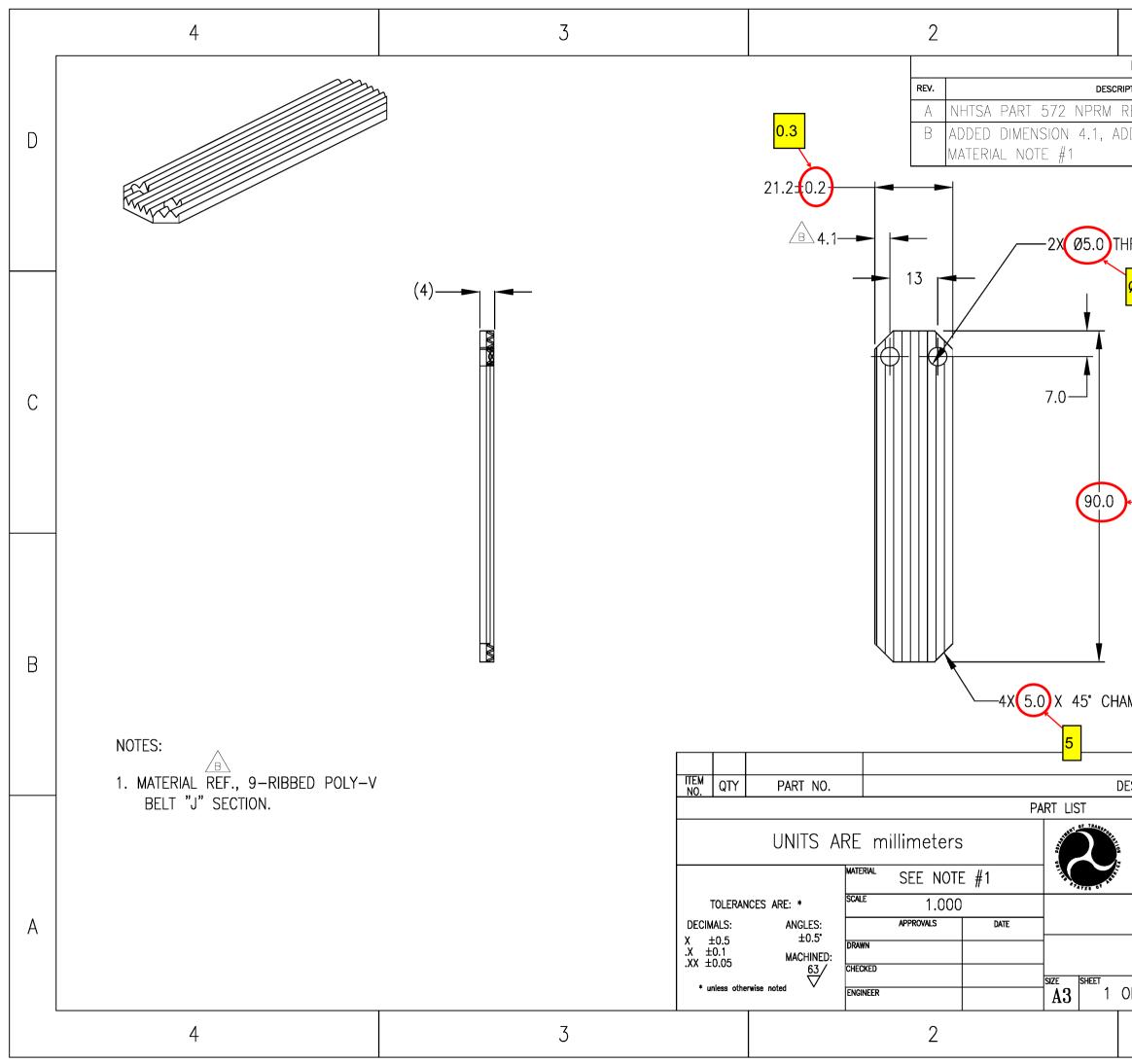


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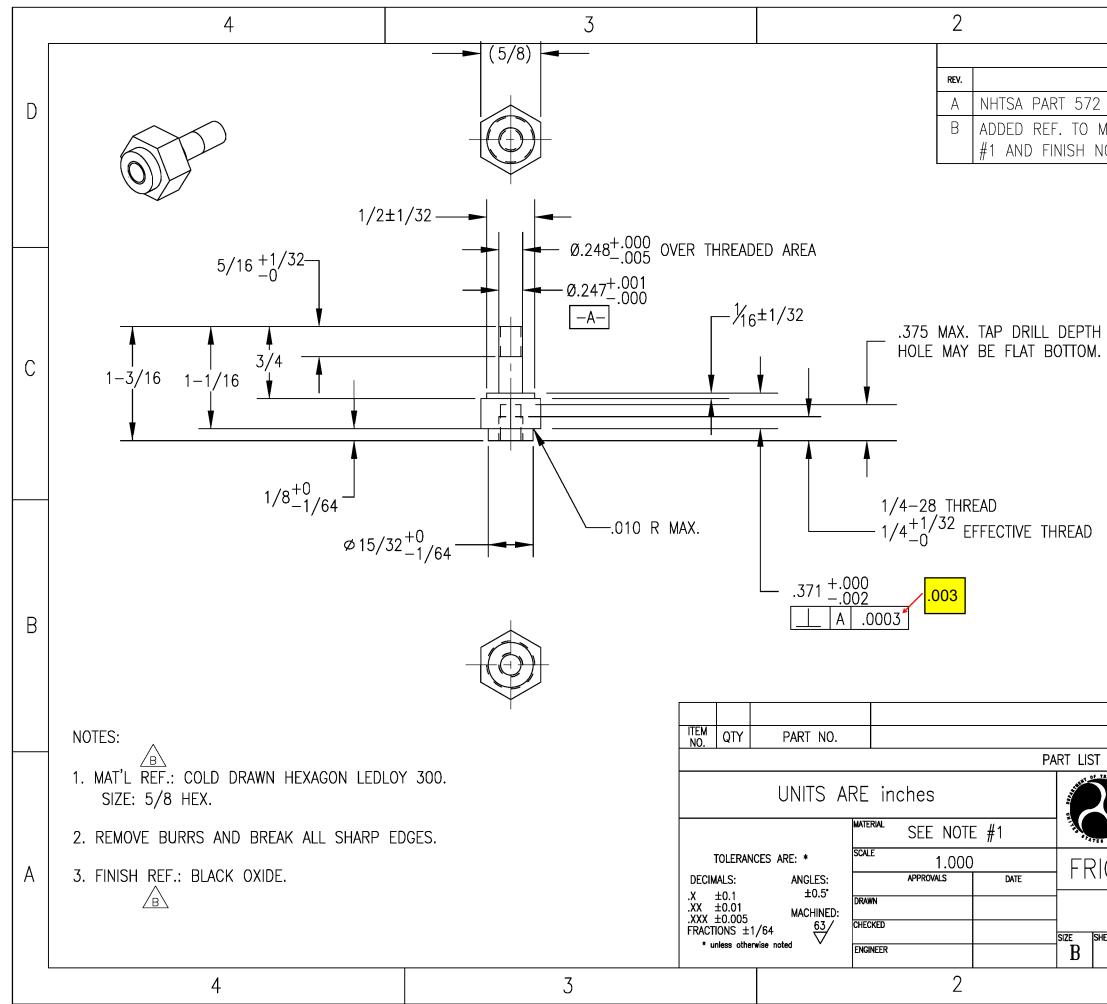
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5000007	SCREW, BHCS	M4 X 0.7	X 20)			
5000003	SCREW, BHCS	M5 X 0.8	X 10)			
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175-3009	CAM STOP BL	.OCK					
175-3008	SHOULDER TO	P PLATE					
175-3007	ELASTIC CORE) HOLDER					
175-3006	SHOULDER CO	OVER PLATE					
175-3004	SHOULDER CA	M CLAVICLE	ASS	EMBLY			
175-3003	SHOULDER "U	" SPRING					
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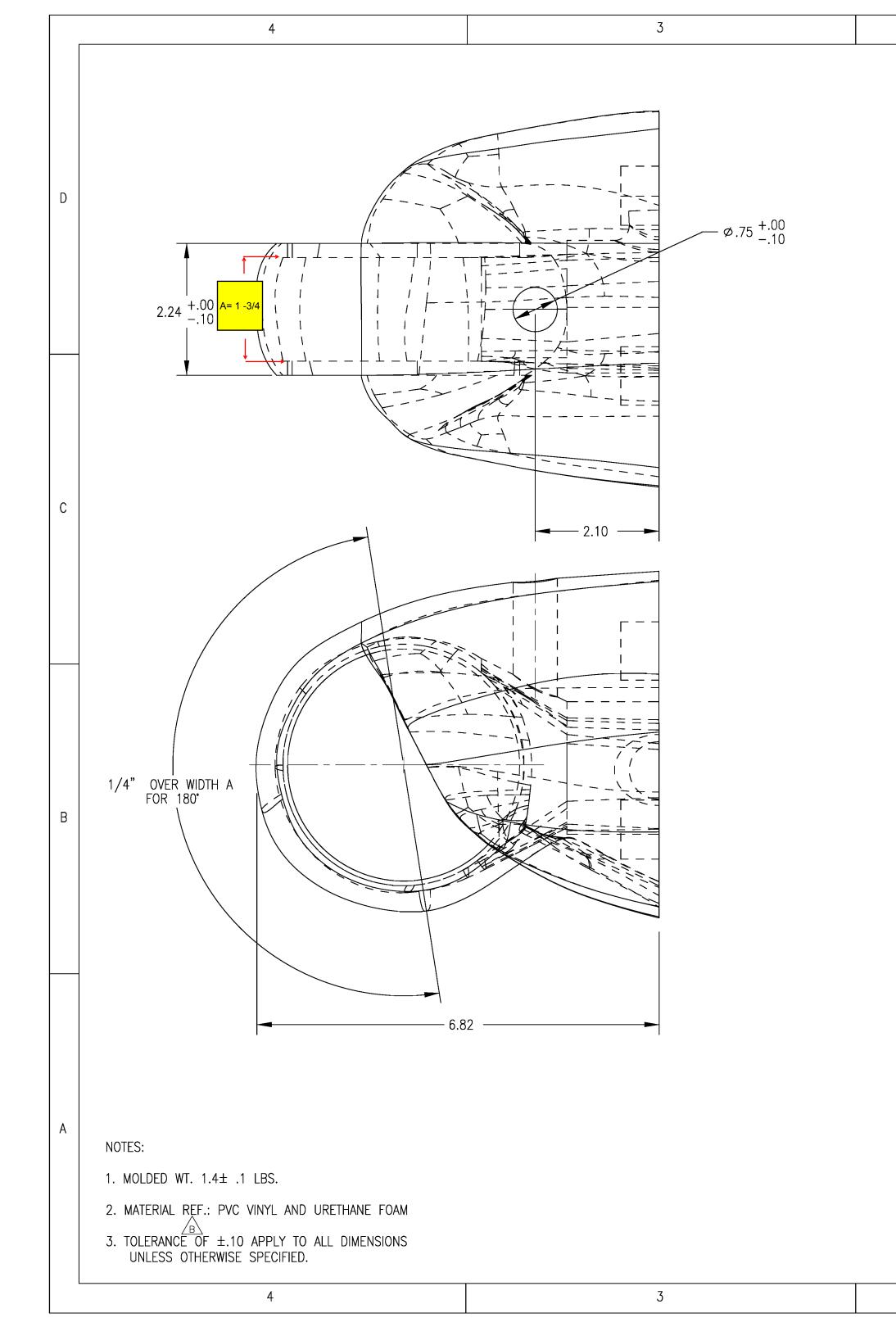
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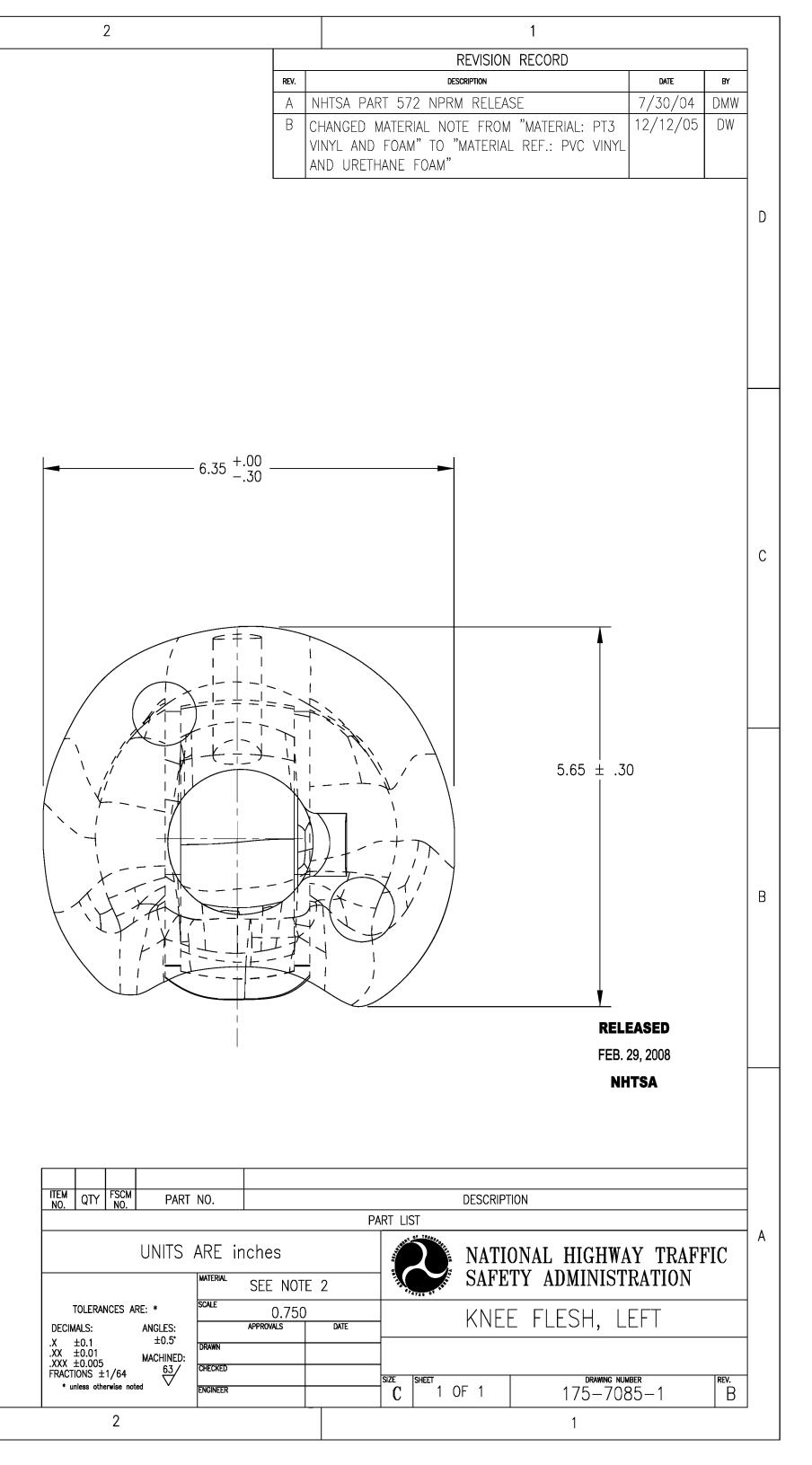


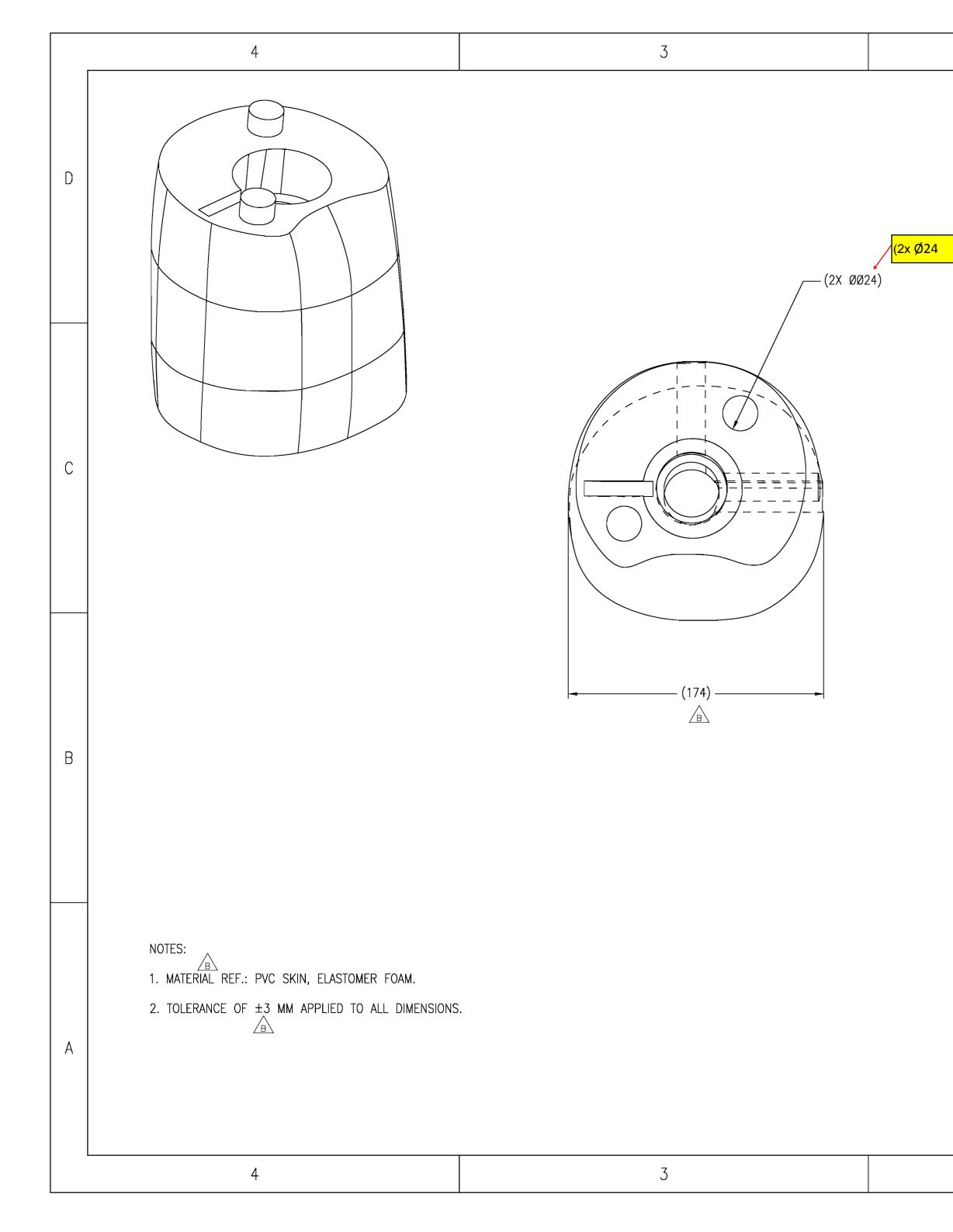
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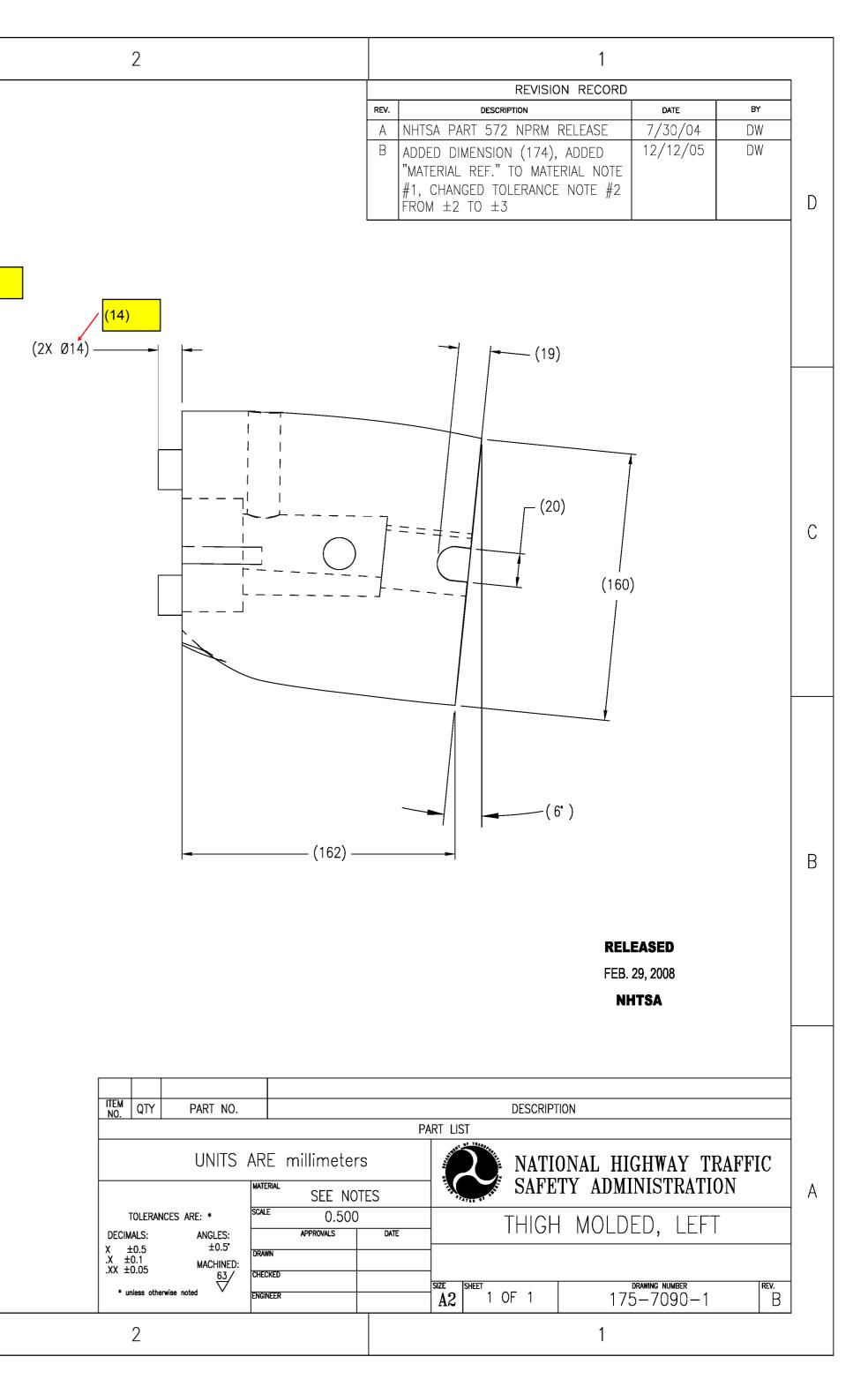


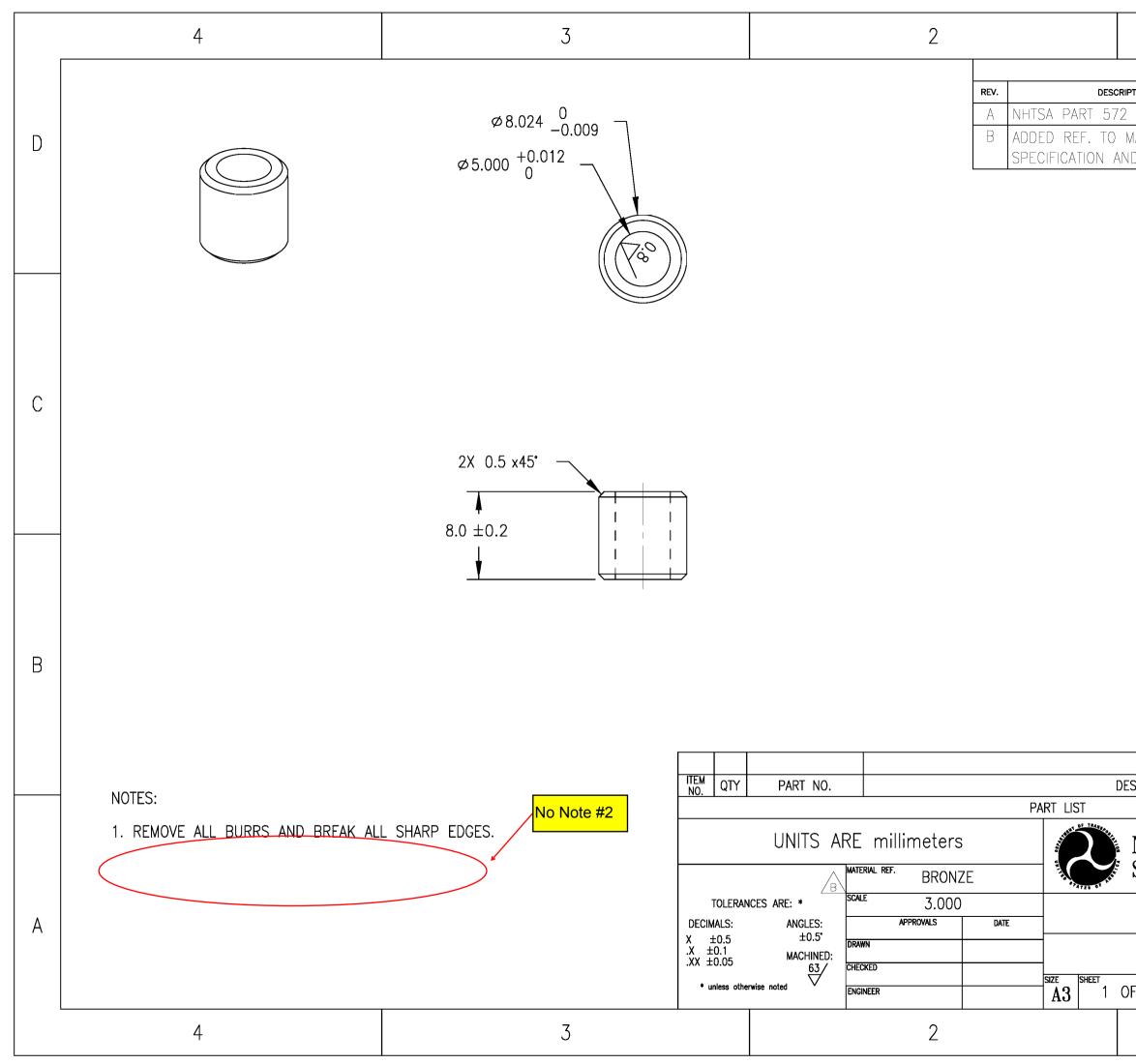
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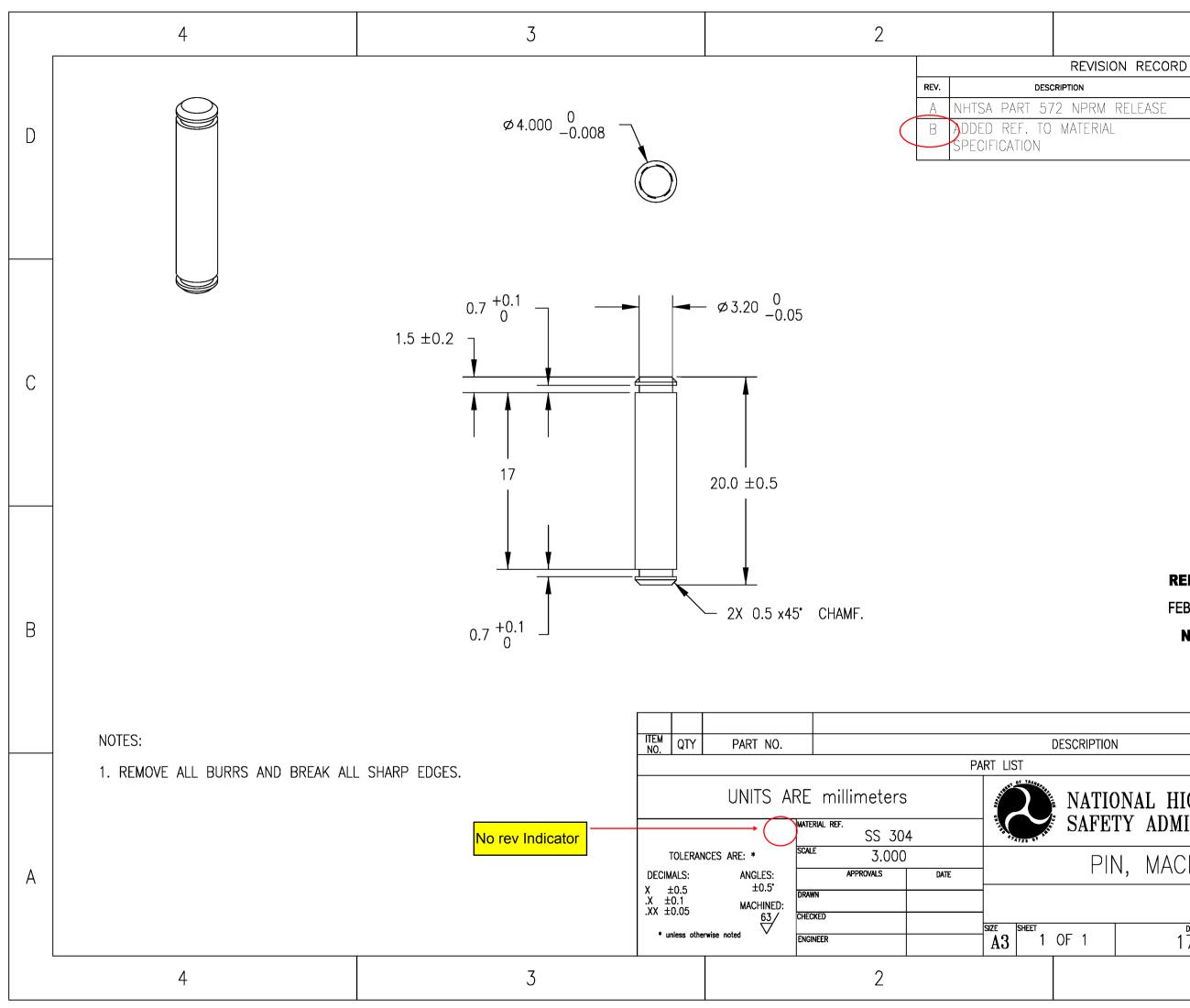




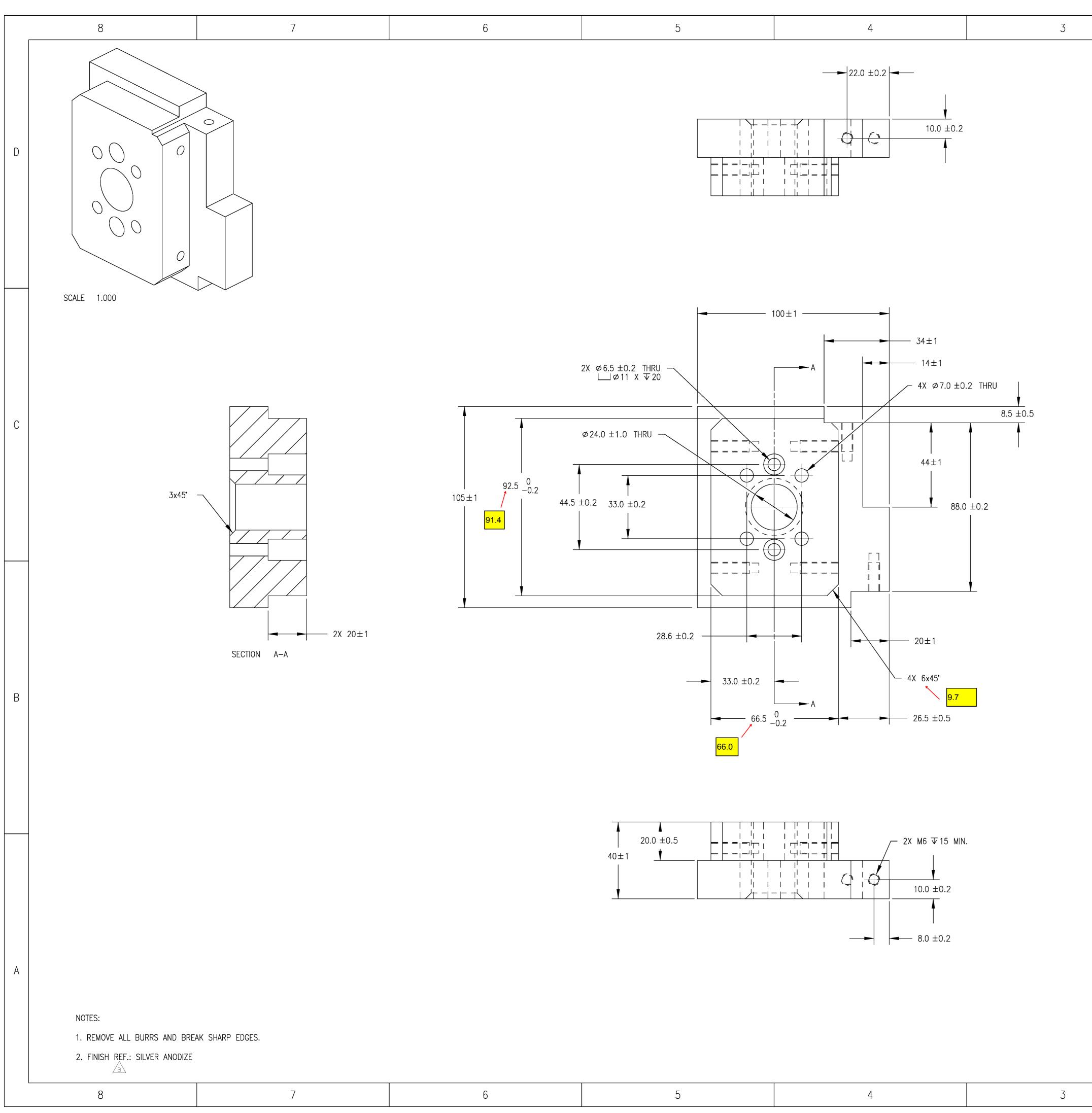




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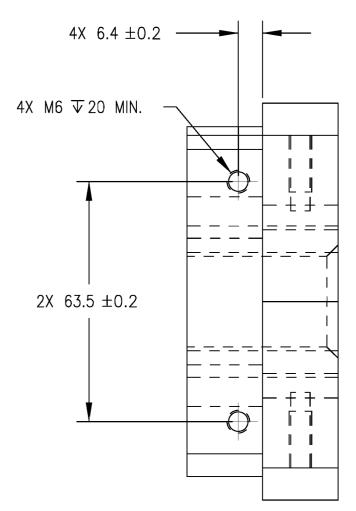
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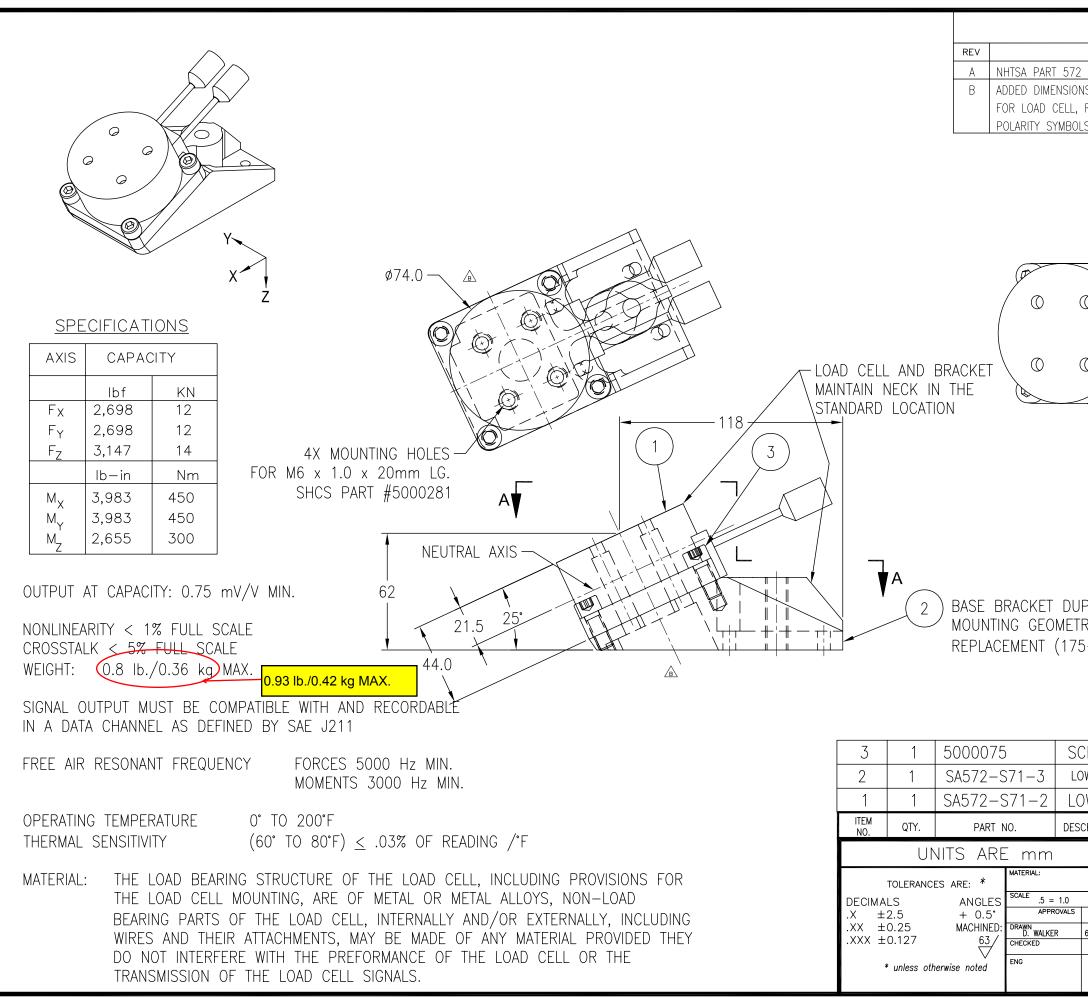
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