PETITION
To Amend FMVSS 208, Occupant Crash Protection
To Require Effective Belt Use Inducement

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Summary
This is a petition to amend Federal motor vehicle safety standard 208 (FMVSS 208) to require effective safety belt use inducement systems in all new motor vehicles sold in the United States. This requirement should become effective no later than the beginning of the 2001 model year. The inducement systems should activate only if a person sits in either front outboard seating position and does not attach the safety belt after occupying the seat and would stop when the belts are buckled. The requirement must be consistent with the ‘interlock’ amendment to the National Traffic and Motor Vehicle Safety Act of 1966 (15 U.S.C. 1410 (b), which prohibits ignition interlocks and continuous buzzers.

The inducements could include, but need not be limited to: (1) a continuous visual warning to buckle safety belts located prominently on the instrument panel, (2) an intermittent, repeating audible suggestion (such as with a synthesized voice) warning occupants to buckle their safety belt, and (3) disruption of electrical power to such non-essential accessories as the radio, tape or CD player, and air conditioning.

We further recommend that NHTSA undertake a quick reaction project to determine the acceptability and effectiveness of various types of use inducements to ensure that the spirit of the AInterlock@ amendment is not violated.

Background
[Not shown here]

Restraint Policy and Use Today
[Not shown here]

An Amendment to FMVSS 208
Therefore, we petition NHTSA to amend FMVSS 208 to require a reasonable and effective safety belt use inducement to be built into all new vehicles. Effective belt use inducements can be required without violating the ‘interlock’ amendment (15 U.S.C. 1410b) to the National Traffic and Motor Vehicle Safety Act. [Detail omitted]

Safety belt use is widespread, generally accepted and required by law in virtually all states. The design for comfort and convenience of safety belts in many new vehicles has improved since the days of the interlock. Thus, we doubt that many motorists would object to well-designed use inducement systems. However, we recommend that NHTSA conduct quick reaction tests using panels and field tests to determine effectiveness and consumer acceptance of various types of use inducements. [Detail omitted]

We note that a policy of increasing belt use through an inducement built into new motor vehicles would be preferable to the present policy of safety belt use laws for reasons unrelated to safety. Civil rights organizations (most recently the Urban League) have objected to primary belt use laws because of their potential to give police officers an excuse to stop minority drivers. Having the inducement built into the vehicle takes away that issue and should be strongly supported by civil rights and civil liberties advocates.
Requiring a belt use inducement built into all new vehicles would be a major improvement in every way to FMVSS 208. As existing cars are retired from use, it would increase belt use to near universality (with the attendant reduction in fatalities and serious injuries in all crash modes) without further state laws or enforcement activities. In fact, states could sunset their safety belt use laws within the next decade or two. We estimate that a belt use inducement has the potential to save a minimum of 7,000 additional lives per year.

We urge that NHTSA give priority to both testing and simultaneous rulemaking in response to our petition.

(The full petition can be found in NHTSA 98-4405-62. To find it, at dms.dot.gov, select ‘simple search’ and type in 4405 as the docket number. The comment is #62. The agency’s response denying the petition can be found in Appendix A: Response to Petition at http://www.nhtsa.dot.gov/cars/rules/rulings/AAirBagSNPRM/AppA.html)