

**Chronology Relating to the Involvement of Jeep CJ-5
and Other Utility Vehicles in Rollover Crashes**

December 1981

**Insurance Institute for Highway Safety
Watergate 600, Suite 300
Washington, D.C. 20037**

JULY 1971

In work done for the U.S. Postal Service, Rice and Brayman report on a series of tests of an American Motors DJ-5 postal Jeep to obtain data on its performance and handling characteristics. One of the conclusions of the evaluation is that the relatively low lateral force required to roll the vehicle over compared to passenger cars "is judged to be a potential safety problem with this vehicle." (Reference 1)

SEPTEMBER 1971

The National Highway Traffic Safety Administration (NHTSA) Office of Defects Investigation concludes that the Department of Defense should not sell the M-151 (1/4 ton jeep) to the general public because of its unsafe handling characteristics, in particular its propensity to roll over. (Reference 2)

APRIL 1973

NHTSA issues an advanced notice of proposed motor vehicle safety standard for rollover resistance. In this notice NHTSA states that it is considering issuing "a safety standard that would specify minimum performance requirements for the resistance of vehicles to rollover in simulations of extreme driving conditions encountered in attempting to avoid accidents." NHTSA indicates that it is considering the use of automatic vehicle controllers to obtain objective and repeatable tests. (Reference 3)

JUNE 1978

NHTSA releases a final report by Rice, et al., summarizing a research program undertaken to "obtain a better understanding of the physics of rollover." The objectives of this program were to quantitatively characterize the nature of vehicle rollovers, and to derive valid and repeatable rollover maneuvers suitable for compliance and certification purposes. A large number of the tests in this program were performed with an automatic vehicle controller steering the vehicles. The vehicles involved in the program were six passenger cars and one pickup truck; no utility vehicles were tested.

One of the principle conclusions of this research was that for the six passenger cars and one pickup truck tested, "untripped rollover, even on high skid-resistance surfaces, is difficult to predict and accomplish." (Reference 4)

OCTOBER 1979

NHTSA is petitioned by a California resident, whose 15-year-old son was killed in an off-road rollover in a Jeep CJ-5, to conduct a defect investigation into the safety and stability of the Jeep CJ-5 both on and off the highway. In response to this petition, NHTSA requests information from American Motors concerning the stability of Jeep CJ-5 and CJ-7 vehicles. (Reference 5)

DECEMBER 1979

Jeep Corporation responds to the NHTSA request. The response states that the Jeep Corporation has never performed any studies concerning the stability of the Jeep CJ vehicles. Furthermore, the response maintained that "Our field experience confirms that when driven properly these vehicles provide safe transportation both off and on the road." (Reference 6)

FEBRUARY 1980

NHTSA denies the petition for a defect investigation and states its analysis--which was based almost entirely on the response from AMC--"indicates that most instances of instability resulting in rollovers occur in circumstances in which the limits of the vehicle are exceeded." (Reference 7)

FEBRUARY 1980

The Highway Safety Research Institute (HSRI) of the University of Michigan completes the report by Snyder, et al., summarizing the on-road crash experience of utility vehicles. The principal conclusion of this report is that utility vehicles experience a rollover rate 5 to 11 1/2 times more than passenger cars and that among a group of popular utility vehicles, the Jeep CJ-5 has the least resistance to rollover. This work was funded by a research grant from the Insurance Institute for Highway Safety (IIHS).

Public release of the report is delayed by HSRI and IIHS at the request of the Jeep Corporation, which claims that the report is "riddled with the misuse of our trademark Jeep and unfounded conclusions about various aspects of utility vehicle performance." (Reference 8)

APRIL 1980

Release of the HSRI report is again postponed at the request of attorneys for the Jeep Corporation and the University of Michigan, pending conclusion of "negotiations" between those two organizations.

MAY 1980

With the agreement of the principle investigator, the HSRI report is released and summarized in Status Report. (Reference 9)

MAY 1980

The Director of HSRI--Dr. Robert L. Hess--responds to a request from the Jeep Corporation to comment on the Jeep Corporation's "assertions that there are technical deficiencies in the report." In this letter, Hess describes the research project as being one of "modest size and was directed at gaining a preliminary insight of the on-road crash experience, safety, and stability of utility vehicles." He also points out, however, that his comments are "not meant to change the content, conclusions, or recommendations of the report." (Attachment 1)

SUMMER AND FALL 1980

Under the technical direction of IIHS personnel, Dynamic Science, Inc. conducts a series of vehicle handling tests of the Jeep CJ-5 and the Chevrolet Chevette. In all of the Jeep CJ-5 tests and most of the Chevette tests the vehicles were driven by an automatic controller to ensure repeatable tests and also to avoid possible hazards to test drivers.

Over 200 individual tests were conducted to determine the handling and stability characteristics of the Jeep CJ-5. Most handling tests of the Jeep CJ-5 were at speeds well below those at which rollover was anticipated. Eight tests were conducted in which the Jeep CJ-5 rolled over--three J-turn and five obstacle avoidance maneuvers. Three of these tests were with new unmodified Jeep CJ-5s--including the two tests witnessed by "60 Minutes" staff--and five of the rollover tests were with Jeep CJ-5s that had been modified; in three tests, optional anti-sway bars were added, and in two tests anti-sway bars were removed.

The Chevrolet Chevette--also driven by the automatic controller---completed the maneuvers that produced rollovers of the Jeep CJ-5 at the same and higher speeds with no rollovers or loss of control. (Reference 10)

OCTOBER 1980

The Highway Loss Data Institute (HLDI) releases its first report on the frequencies of insurance claims for injuries to occupants of 1977-79 model year vans, pickup trucks, and utility vehicles.

The injury claim frequency for the Jeep CJ-5 "was higher than any other vehicle in this report and was also higher than all but two of the passenger cars for the same model years." The results for the Jeep CJ-5 "for claims exceeding \$250 was the highest injury frequency result in this claim size category ever reported by HLDI. (Reference 11)

NOVEMBER 1980

The Motor Vehicle Manufacturer Association's (MVMA) Light Truck Accident Panel publishes comments on the February HSRI report. This report states that "careful analysis of the report leads to the conclusion that it lacks scientific exactitude and objectivity." The members of the Light Truck Accident Panel are not identified. [The chairman of MVMA at this time was Gerald C. Myers, Chairman of the Board for American Motors Corporation (AMC).] (Reference 12)

DECEMBER 1980

The San Francisco Chronicle publishes a series of articles concerning lawsuits against the Jeep Corporation involving the rollbar on the Jeep and also the tendency of the vehicle to roll over. Out of court settlements in California of more than \$2 million were reported for two young men who were paralyzed in separate crashes, and a \$2.2 million jury verdict against Jeep in Ohio. One of these articles also reports that "The Federal Trade Commission, concerned that Jeep advertising may induce owners to drive Jeeps beyond the vehicles' capabilities, has been gathering information for nearly a year from attorneys who have sued Jeep and from the Washington-based Center for Auto Safety, a consumer group that gathers safety-related data." (Reference 13)

DECEMBER 1980

The CBS show, "60 Minutes," televises a report on the handling characteristics of the Jeep CJ-5. This presentation highlights IIHS-sponsored handling tests conducted by Dynamic Science, Inc., in which rollovers occurred at a speed as low as 22 mph. In addition, the show also includes footage of tests conducted by the Jeep Corporation to

rebut the IIHS-sponsored tests. Although rollovers did not occur in the Jeep Corporation tests, in some of the maneuvers the wheels of the Jeep CJ-5 left the ground, indicating the vehicle was very close to rolling over.

DECEMBER 1980

IIHS publishes a special issue of Status Report, devoted to articles documenting the serious problem of on-road rollovers of the Jeep CJ-5. This issue of Status Report includes information on: the results from the Dynamic Science, Inc. handling tests of the Jeep CJ-5; preliminary findings from a study being carried out jointly by IIHS and the Highway Safety Research Center (HSRC) of the University of North Carolina, examining the crash experience of popular utility vehicles and pickup trucks in Maryland and North Carolina; the national fatal crash experience of such vehicles obtained from the NHTSA Fatal Accident Reporting System (FARS); and information on 37 court cases involving Jeep CJ models.

The preliminary results obtained in the HSRC/IIHS study showed that the Jeep CJ-5 was much more frequently involved in single vehicle rollover crashes than other popular utility vehicles in both Maryland and North Carolina. The fatality experience for the Jeep CJ-5 showed that in 1978 and 1979 it had more crashes with at least one occupant fatality for each 10,000 vehicles registered than motorcycles. (Reference 14)

FEBRUARY 1981

In articles in the Detroit Free Press it is reported that AMC "has paid more than \$9 million in out-of-court settlements since 1973 in cases involving persons killed or injured when Jeep CJs overturned." (Reference 15)

FEBRUARY 1981

In a deposition related to lawsuits against American Motors Corporation concerning rollovers of the Jeep CJ-5, Gerald C. Myers, Chairman of the Board of AMC, in response to a question about the avoidance maneuvering capability of a Jeep CJ-5 in an emergency states, "There are instances, and I think they are commonly demonstrated, where normal passenger cars would lose control in the sense that they would slide out and be outside the control of the driver where a CJ-5 would not, and I consider a CJ-5, therefore, to be in many instances, if not most, more safe or safer than passenger cars under those kinds of circumstances."

When asked if he had received any tests or had any tests been brought to his attention either by AMC or Jeep Corporation relative to the susceptibility of the CJ-5 to roll over during an avoidance maneuver, Mr. Myers states, "No, we have not until recently, and we are performing a few things at the moment."

When asked if he knew of any study made by Jeep Corporation or AMC to determine the rollover rate of utility vehicles compared with passenger cars, he responds, "No, I do not. Such tests are unnecessary. We know what the vehicles are capable of." When asked if he ever felt the need to request any such study, he replies, "Absolutely not. We know that we have a safe vehicle and we know it is safer than many other vehicles on the road and has attributes which are strong and which are appealing and we see no need to perform such tests."

In response to questioning concerning factors that would cause one vehicle to be more susceptible to rollover than another vehicle, Mr. Myers replied, "I am trying to get you to understand that the important subject is control and not rollover. It makes no difference whether a vehicle has rolled over or whether a vehicle has lost--a person has lost control of the vehicle as to the consequences of that event. So answering your question specifically, which has to do with loss of control--well, I assume now are you asking me: Do you have loss of control in a rollover--I will answer your question as: Yes, but that is not the only instance in which there is loss of control.

"For example, a Chevrolet Chevette going around maybe the same turn that another vehicle would go around, instead of rolling over would slide out and the vehicle could probably get involved in an untoward accident or crash. It's just a matter of which way the vehicle gets into trouble at probably some comparable speed." (Reference 16)

In the same series of depositions, Lawrence H. Hyde, President of AM-General, a subsidiary of the American Motors Corporation and a member of the Board of Jeep Corporation, in response to questions concerning the "60 Minutes" show on the Jeep CJ-5, states that the way the Dynamic Science, Inc. tests were shown "was outrageously dishonest," and that Dynamic Science tests were a "fraud." (Reference 17)

In the same series of depositions, George McCord, the test driver in the American Motors tests, performed with intention of rebutting the Dynamic Science, Inc. tests that were shown on "60 Minutes," states that he was not aware that the wheels of the CJ-5 had ever left the ground. (Reference 18)

MARCH 1981

Erie Insurance Group sends to its policyholders a document entitled, "Driving A Jeep Could Be Hazardous to Your Health." This document was based on the IIHS tests and data analyses concerning the Jeep CJ-5. (Attachment 2)

MARCH 1981

A report prepared by Milliken and Rice for the Legal Department of American Motors Corporation criticizes the procedures used in the tests at Dynamic Science, Inc. The authors claim that the rollovers obtained in this test "reflect unrealistic human-driver actions for the intended maneuvers." They also claim that the lateral forces which could cause a Jeep CJ-5 to roll over are "comparable to or better than most other vehicles on the highway."

The authors apparently chose to ignore tests reported by Rice himself in 1978 which showed much higher forces being experienced by passenger cars in similar maneuvers without rollover. In addition, they apparently also chose to ignore the fact that Rice himself concluded in 1971 that the DJ-5 postal Jeep had a "potential safety problem" because of the relatively low force required to roll it over--a force very similar to that required to roll over the Jeep CJ-5.

The authors also claim that the forces necessary to roll over a Jeep CJ-5 were much higher than those to which drivers were willing to subject themselves. The authors ignore the fact that these latter results were obtained in passenger cars with relatively soft suspensions, which permitted substantial amounts of body roll (leaning to one side without the wheels leaving the ground) compared to the Jeep CJ-5, and that body roll substantially limits the extent to which drivers will maneuver a vehicle. Further, they compare the forces required to roll over the Jeep CJ-5 with the average forces experienced by a group of drivers, ignoring the fact that some individual drivers generated forces in the passenger car tests that were comparable to those that would produce rollover in a Jeep CJ-5. (Reference 19)

APRIL 1981

Forrest A. Hainline, Vice President and General Counsel for American Motors Corporation, writes to Erie Insurance Group, demanding that distribution of the Erie document be ceased immediately and that Erie "publish a retraction of the statements in it, and that you send such retraction to all policyholders and other persons who have received a copy." Mr. Hainline also states that "...failure to do so will magnify our damages and your liability." (The Erie Insurance Group apparently did not respond to these threats.) (Attachment 3)

MAY 1981

At the Governor's Safety Conference in Wyoming, James A. Tolley, Vice President of Public Relations of AMC, states that the Jeep CJ-5s rolled over in the Dynamic Science, Inc. tests because the mechanical steering device spun the wheel "much faster than you could ever do it, or any human could do it, then holding the wheel at that cramped angle for an unusually long period of time without ever backing up the steering wheel." (This allegation is incorrect because the steering wheel inputs were based on results obtained with actual drivers in tests simulating emergency conditions conducted for General Motors.) (Reference 20)

Mr. Tolley also states, with respect to the HSRI report, that IIHS "withdrew funding for the project before the project was completed, and the Institute went ahead and published the report anyway." In fact, IIHS funded several cost overruns on the HSRI grant and the report was published by HSRI, not by IIHS. (Reference 21)

SUMMER 1981

Nationwide Insurance sends copies of the special Jeep CJ-5 Status Report to its regional offices for distribution to its policyholders owning Jeep CJ-5 vehicles.

JULY 1981

Milliken and Rice publish the results of a series of handling tests of the 1981 model Jeep CJ-5 conducted for the Legal Department of AMC. In these handling tests, one rollover and over 50 wheel lift-offs occurred (in the latter tests the vehicle was prevented from rollovers by outriggers that had been added to the vehicle). These tests, in effect, confirmed the IIHS tests which showed that the Jeep CJ-5 could easily be induced to roll over. Despite the ease with which rollovers or potential rollovers could be produced with this vehicle, Milliken and Rice conclude that the 1981 Jeep CJ-5 "provided an operating envelope that is adequate for safe use in both normal and emergency on-road operation," again apparently ignoring the fact that some years earlier Rice had concluded that similar performance limits for the DJ-5 postal Jeep represented a "potential safety problem" for that vehicle. (Reference 22)

JULY 1981

NHTSA is petitioned to initiate an investigation to determine whether the rollover of CJ-5 Jeep vehicles constitutes a defect which could result in a safety recall campaign. (Reference 23)

AUGUST 1981

As part of its evaluation of the July petition, NHTSA requests the Jeep Corporation to provide it with "Jeep's analysis of the CJ-5 Jeep vehicle stability testing that Dynamic Science, Incorporated, performed on behalf of the Insurance Institute for Highway Safety." (Reference 24)

SEPTEMBER 1981

HLDI publishes its second report on the injury claim frequency results for vans, pickup trucks and utility vehicles. This reports, "The Jeep CJ-5 had by far the worst results; its overall claim frequency was 122 percent worse than the all-vehicle average and the frequencies rose to three times the average for claims with medical costs exceeding \$1,000. The frequency of claims exceeding \$250, \$500, and \$1,000 for the Jeep CJ-5 were all higher than those for any other vehicle in this report and were also higher than those for any of the passenger cars reported for the same model years." (Reference 25)

SEPTEMBER 1981

The joint study by HSRC/IIHS comparing the crash experience of utility vehicles, pickup trucks and passenger cars is released. This report concludes "In virtually every category of comparison--crash involvement rates (particularly single vehicle), serious (A+K) driver injuries, rate of overturn, serious driver injuries in rollover crashes, serious injuries for belted and unbelted drivers--the Jeep CJ-5 had the least favorable results of the various vehicles studied." [A and K are the police codes for serious and fatal injuries.] In addition, "...an examination of the possible effects of driver age on rollover rates was conducted. It was found that any age effect was at most marginal in either Maryland or North Carolina." (Reference 26)

OCTOBER 1981

AMC forwards to IIHS its critiques of the HSRI report and the Dynamic Science, Inc. tests prior to meeting with the IIHS staff.

Members of the IIHS staff meet with four representatives from AMC and the Jeep Corporation. There is a discussion of the HSRI report and the tests at Dynamic Science, Inc. The basic position taken by the representatives of AMC and Jeep Corporation is that none of the work had effectively eliminated the driver effect and that the high frequency of rollovers involving the Jeep CJ-5 could not be attributed to the vehicle but instead to driver misuse of the vehicle.

OCTOBER 1981

U.S. District Court, Eastern District of Michigan, approves a motion to quash a subpoena issued against Richard G. Snyder, principle author of the HSRI report, requiring that he produce all of the raw data and working papers used in the compilation of that report. This subpoena was originally issued at a plaintiff's request but AMC later joined the plaintiff in seeking this information.

OCTOBER 1981

Richard G. Snyder responds to an inquiry from a law firm seeking clarification of his position concerning the HSRI report. In his response, Snyder states, "The authors stand fully behind the report and we feel the resulting conclusions and recommendations are clearly stated."

NOVEMBER 1981

In view of the fact that NHTSA had requested "Jeep's analysis of the CJ-5 stability testing that Dynamic Science, Incorporated performed on behalf of the Insurance Institute for Highway Safety," IIHS submits a review criticizing the two reports commissioned by AMC by Milliken and Rice to the NHTSA docket on the pending petition to commence a defect investigation of the Jeep CJ-5. (Reference 27)

NOVEMBER 1981

The NBC MAGAZINE television show includes a segment describing roll-over problems, and resulting spinal cord and other injuries, with the DJ-5 postal Jeep.

NOVEMBER 1981

The Federal Trade Commission (FTC) publicizes a proposed consent order that it had negotiated with AMC and Jeep Corporation. The proposed order requires the Jeep Corporation to affix to the instrument panel or windshield frame of each new Jeep CJ model vehicle a sticker warning: "This multipurpose vehicle handles and maneuvers differently from an ordinary passenger car. As with other vehicles of this type, sudden sharp turns and abrupt maneuvers may result in loss of control. Read driving guidelines in Owner's Manual and Supplement. WEAR SEATBELTS AT ALL TIMES."

Additionally, Jeep Corporation agreed to revise the owner's manual and supplement that is supplied with Jeep CJ vehicles to include specific

warnings about the handling characteristics of the vehicles. In addition, the warning sticker and revised owner's manual and supplement is to be mailed to all identifiable registered owners of 1972 and later Jeep CJ models. (Reference 28)

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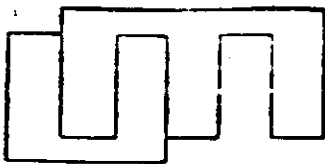
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12. Motor Vehicle Manufacturers Association, Light Truck Accident Panel. Comments, "On-Road Crash Experience of Utility Vehicles," UM/HSRI (UM-HSRI-80-14). Detroit, MI, November 3, 1980.
13. San Francisco Chronicle articles: "Jeep Pays \$2 Million to Settle Lawsuits, R. Carroll and M. Taylor, December 8, 1980, p. 1; "What the Experts Say About Roll Bars," M. Taylor; "Tests Show Jeep Prone to Flip Over," M. Taylor and R. Carroll, December 9, 1980, p. 1; "2 U.S. Probes of Jeep Firm," M. Taylor, December 11, 1980, p. 5
14. Insurance Institute for Highway Safety. Status Report, Vol. 15, No. 19. Washington, DC, December 22, 1980.
15. Detroit Free Press articles: "AMC Pays Millions in Jeep Crash Suits" and "Why Utility Vehicles are Criticized," M. I. Trammer, February 1, 1981, p. F-9.
16. Deposition of Gerald C. Meyers, Chairman of the Board, American Motors Corporation, February 23, 1981. This deposition was taken by plaintiffs in litigation resulting from several Jeep CJ rollovers. It is on file in each of the cases. See, for example, Haynes et al v. American Motors and Jeep Corporation, No. 79-5045 (USDC, Western District of Arkansas, Fayetteville Div.).
17. Deposition of Lawrence H. Hyde, President, AM-General, February 23, 1981. This deposition was taken by plaintiffs in

litigation resulting from several Jeep CJ rollovers. It is on file in each of the cases. See, for example, Haynes et al v. American Motors and Jeep Corporation, No. 79-5045 (USDC, Western District of Arkansas, Fayetteville Div.).

18. Deposition of George McCord, test driver for American Motors Corporation tests of CJ-5 Jeep, February 24, 1981. This deposition was taken by plaintiffs in litigation resulting from several Jeep CJ rollovers. It is on file in each of the cases. See, for example, Haynes et al v. American Motors and Jeep Corporation, No. 79-5045 (USDC, Western District of Arkansas, Fayetteville Div.).
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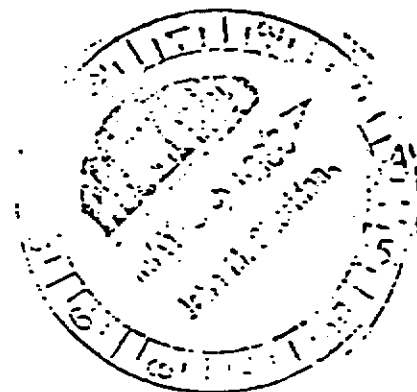
May 27, 1980

HIGHWAY SAFETY RESEARCH INSTITUTE

Institute of Science and Technology

Huron Parkway and Baxter Road

Ann Arbor, Michigan 48109



Mr. John M. Sheridan
 Secretary and General Attorney
 Jeep Corporation
 American Center
 27777 Franklin Road
 Southfield, Michigan 48034 .

Dear Mr. Sheridan:

The University of Michigan's Highway Safety Research Institute research report entitled "On-Road Crash Experience of Utility Vehicles" has been sent to the sponsor, the Insurance Institute for Highway Safety of Washington, D.C., as you know.

This research project was of a modest size and was directed at gaining a preliminary insight of the on-road crash experience, safety, and stability of utility vehicles. It is important that any reader of the report not consider it to be a final, a complete, or a fully definitive study--thus my choice of phrases above: "modest size" and "preliminary insight." This is stressed at numerous points in the report with the hope that readers will not fail to read and understand the qualifications of the study. The effort expended was a sincere effort to provide the sponsor with an objective set of findings within the limitations of manpower and cost allowed. This we feel we have accomplished. Our researchers and undoubtedly our sponsor as well as perhaps your corporation would all have preferred to have done a truly comprehensive study which would have encompassed a fuller range of data and more analysis and perhaps this can be done in the future from this start.

These comments are made following detailed discussions with the researchers involved and are in response to your request that HSRI comment on your assertions that there are technical deficiencies in the report, made at your meeting with Mr. Daane on May 7, 1980. They are not meant to change the content, conclusions, or recommendations of the report. They are meant to assure you of our concern and hope that the report will not be used in an out-of-context manner by others so as to poorly or inappropriately reflect upon either the Jeep Corporation, other manufacturers of utility vehicles, or HSRI. Very significant questions are raised that could not be

Mr. John M. Sheridan

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May 27, 1980

addressed in the study and these, by all rights, should be addressed before anyone claims to understand the apparent full thrust of the data. The recommendations 7.2.1 D) and E) refer to the most important of these questions yet unanswered.

Sincerely,

Robert L. Hess

Robert L. Hess
Director

RLH/dc

cc: R. Daane
W. McCormick
T. McDole
R. Snyder

Driving A Jeep Could Be Hazardous To Your Health!

Dear Policyholder:

We have, at your request, insured your AMC Jeep. We wonder, however, if you realize that the Jeep is perhaps the most dangerous vehicle on the road today. In fact, it has been proven that the Jeep is extremely vulnerable to rollover at even moderate speeds.

Recently, handling tests were run by Dynamic Science, Inc., an independent testing facility. All tests were performed under dry, daytime conditions on asphaltic concrete surface. The tests involved two maneuvers (see inside for actual photos). In the "J-turn" maneuver, vehicles were steered into 90-degree turns. In the "obstacle avoidance" maneuver, the Jeep was steered to the left to avoid an obstacle in its right-of-way and then steered sharply to the right in order to return to its right-of-way once the obstacle had been passed.

The Jeep showed a propensity to roll over in the "J-turn" at speeds of 22 mph and in the "obstacle avoidance" at speeds of 32 mph. Other vehicles can negotiate these maneuvers at much higher speeds with no rollover problems whatsoever. Apparently, the Jeep's weakness is its high center of gravity and short, narrow wheelbase. (Incidentally, the AMC Jeep's rollover problem was reviewed quite comprehensively in a recent showing of the popular weekly TV program "60 Minutes". You, or members of your family, may have seen that particular show.)

The Jeep, because of its rollover propensity and lack of protection to driver and passengers, has a rate of fatality per registered vehicle that is higher than the motorcycle—one of the most hazardous types of vehicles on the highways.

We are passing on this information to you for several reasons. First, we are concerned over your safety and the safety of your passengers. Secondly, although you may be a safe, defensive-type driver who can handle the Jeep, this vehicle may be available to others who will take more chances than they should. Finally, as you undoubtedly have already concluded, the safe operation of as dangerous a vehicle as the Jeep demands nothing less than utmost caution by mature, experienced, responsible drivers.

Very truly yours,
ERIE INSURANCE GROUP

American Motors Corporation

Forrest A. Hainline, Jr.
Vice President and General Counsel
American Center
27777 Franklin Road
Southfield, Michigan 48034
Phone: 313/827-2810

April 8, 1981

Mr. Peter Cipriani
Senior Vice President
Erie Insurance Company
144 East Sixth Street
P. O. Box 1699
Erie, Pennsylvania 16530

Dear Mr. Cipriani:

Mr. Beattie of this corporation has requested that you cease distribution of a document which you sent to your policyholders entitled "Driving a Jeep Could be Hazardous To Your Health."

This document contains several untrue, libelous and vicious statements concerning our Jeep CJ-5 and our other Jeep vehicles.

This document and your unconscionable actions have damaged the reputation of the entire Jeep product line. It is incredible that your company would publish a document with a reckless disregard for accuracy.

This letter is to demand that you immediately cease distribution of this document; that you publish a retraction of the statements in it, and that you send such retraction to all policyholders and other persons who have received a copy of it. Your failure to do so will magnify our damages and your liability.

Very truly yours,

Forrest A. Hainline, Jr.

Forrest A. Hainline, Jr.

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