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June 25, 1990

The Honorable Jerry Ralph Curry
Administrator
National Highway Traffic Safety Administration
400 7th Street, S.W.
Room 5220
Washington, D.C. 20590

RE: PETITION

Dear General Curry:

The Institute for Injury Reduction, Public Citizen, and the Center for Auto Safety petition the National Highway Traffic Safety Administration to undertake a defect investigation of Jeep CJ-5 and CJ-7 utility vehicles, or to reopen such earlier investigations that have been closed by the Agency.

In addition, we request the Agency to open a proceeding to determine whether AMC Corporation, Jeep Corporation, and/or Chrysler Corporation have violated Sections 151 et seq. of the National Traffic and Motor Vehicle Safety Act (cit.) pertaining to manufacturers' obligations to disclose knowledge of safety defects in motor vehicles and to take specified notification and recall action based on such knowledge.

The requested actions are intended to lead to (1) recall and correction of defective CJ vehicles now on the highways and (2) appropriate action against Chrysler/AMC/Jeep Corporation for violations of Sections 151 et seq.

The matters which petitioners request be investigated are as follows:

1. The undue, unnecessary and defective propensity of the CJ vehicles to roll over under foreseeable handling conditions, including in turning maneuvers at speeds as low as 22 miles per hour.

2. The manufacturers' knowledge of a suspension system defect, i.e., a failure-prone shackle pin, which could induce or aggravate the likelihood of rollover.
3. The CJ's lack of adequate rollbar or other occupant protection in the event of a rollover--a defect aggravated by the vehicle's undue and unnecessary rollover propensity.
4. The manufacturers' consistent and continued withholding of essential information, documents, and knowledge from NHTSA which showed the existence of such defects now revealed in various product liability actions and other sources, and without which the Agency was denied an adequate record on which to proceed with its earlier investigations.

The Agency has specifically requested the manufacturers of the Jeep CJ to provide it with information and knowledge relating to one or more of the above-described defects in its past defect investigation proceedings, including but not limited to the Center for Auto Safety petition of 1978, the Barrow petition (P80-002), and the Kerlinsky petition (P81-018).

In addition, the manufacturers have a continuing affirmative obligation to provide such information and knowledge to the Agency under the provisions of Section 151 et seq.

The information and knowledge withheld by the manufacturers of the CJ-5 and CJ-7 from NHTSA are embodied in the documents appended hereto. They are described in the following summaries, which also include specific requests for NHTSA investigative and recall actions.

DOCUMENT #1

May 3, 1973: Memo from D.C. Mallett to R.C. Lunn, re "Roll Bar Installation," noting the results of the author's inspection of CJ-5 roll bar installations and stating: "The integrity of the installation appears to be questionable and could jeopardize the company's position if we do not have proper engineering data to substantiate this installation."

The memo describes defective aspects of the roll bar, including that the "mounting does not lie flat on the top surface of the wheelhousing but makes a line contact on top of a stiffening

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rib," and that "the reinforcement plate under the top surface of the wheelhousing is about one inch wide and twelve inches long; too small to spread the load over the sheet metal surface."

DOCUMENT #2

December 22, 1975: Jeep Metallurgical Laboratory Vendor Contract Report by Rahn Huffstutler, re Spring Shackle, noting that "Studs (5353133) are carburized and failing on the line."

DOCUMENT #3

January 5, 1976: Jeep Metallurgical Laboratory Vendor Contract Report dated January 5, 1976, by Rahn Huffstutler, re Spring Shackles, Parts Nos. 5353130 and 3223998, stating the following "complaint": Shackles failing on the line and unsatisfactory checks of incoming material."

DOCUMENT #4

January 6, 1976: Memo from V.S. Wielosinski to Jean Rutherford, seeking a deviation in steel used for front and rear shackle and pin assembly, re Parts Numbers CJ 5353130 and 3223998.

DOCUMENT #5

January 9, 1976: Memo from V.S. Wielosinski to M.L. Nowatney regarding the same parts, noting reports of shackle failure. "These shackles have been tempered and there is no other way in which the laboratory can further increase the strength of the shackles."

DOCUMENT #6

January 27, 1976: Supplier Quality Assurance Survey Report for Parts 3223998 and 3219787, "Shakle [sic] and Pin Assy.-Rr. Sprng." The document describes a visit to a supplier plant to follow up on rejections of the parts "both for material and hardness variations which caused breakage in assembly."

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DOCUMENT #7

June 10, 1976: Memo from R.M. Huffstutler to S. Schlueter re CJ Spring Shackles, Parts Numbers 5353130--Front, and 322398--Rear, stating that five failed shackles were submitted to the Metallurgical Laboratory and it was found that their "bolts failed by overtorque." "We are of the opinion the torque limit on these bolts approaches the ultimate yield limit much too frequently."

DOCUMENT #8

June 22, 1976: Memo from R.M. Huffstutler to V.S. Wielosinski, re CJ Spring Shackles, same parts numbers as in June 10 memo. Contains recommendations for new material and heat treat specifications for the shackle pins.

DOCUMENT #9

November 1, 1978: Memo from R.M. Huffstutler to W. Raymer, re CJ Shackles, describing enclosed reports (not with this document) "concerning CJ Shackle tests."

DOCUMENT #10

December 12, 1978: Memo from R.M. Huffstutler to E. Regehr, re CJ Shackles, describing "complaints and inquiries" received concerning "the current CJ shackle problem at American Motors (Canada) Limited," and noting that the problem parallels that of the U.S. company. It states that "this laboratory has tried a number of times to have the [shackle] pins heat treated to grade 5. We were successful only during a deviation period during fire related damage at the vendors plant."

DOCUMENT #11

February 2, 1979: Handwritten memo from "DNR to MWS, RCL, DED" (proved to be from AMC engineer Dennis Renneker to D. E. Dawkins, R. C. Lunn and other senior AMC executives), entitled: "Vehicle Rollover - CJ-Type Vehicles. It offers a formula for determining

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"how easily a vehicle will roll over," and concludes that "any vehicle with a calculated roll over g level of 0.80 or less will probably roll over quite easily on a skid pad."

An attached table shows the CJ-7 to have "calculated roll over g level" of .75, the lowest of any shown in the table utility and other vehicles sold in the U.S. market. A second attachment shows that "a CJ-type vehicle rolls over" in a 50 mph turning maneuver in which "good passenger car[s] skid out."

DOCUMENT #12

July 26, 1979: July 26, 1979: Memo from Dennis Renneker, AMC engineer, to D.E. Dawkins and R. C. Lunn, senior AMC executives, entitled: "Answers to Questions on CJ Rollover." Memo states:

"...Any combination of CG height and track width which plot on the $u = 0.8$ line will theoretically roll over at 0.8 g's.

"I believe a true safe design limit to be 0.9 g's. Any vehicle which falls below the 0.9 line on the graph will not roll over on a smooth surface. Any above probably will."

The referenced graph, attached to the memo, shows the CJ-7 to be substantially above the 0.9 line and even above the 0.8 line.

A second graph contains "CJ Proposals" for lowering the vehicle's center of gravity and increasing its track width.

The memo continues:

"I have started a study to determine the feasibility of lowering the CJ-5 and 7 by 1.0". We are also looking at other handling improvement possibilities - tires, geometry, etc."

It refers to "my original letter on CJ rollover."

NHTSA is specifically urged to request copies of the referenced "feasibility study" and "original letter on CJ rollovers" from Chrysler-AMC to the extent it may be a document other than the handwritten memo of February 2, 1979.

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DOCUMENT #13 (13a through 13cc)

January 1981: The Milliken-Rice Study: In January 1981, in an apparent attempt to disprove the rollover findings of the Insurance Institute for Highway Safety project conducted by Dynamic Sciences in 1980 and shown on CBS '60 Minutes' in December 1980, AMC contracted with Milliken Research Associates to carry out a program "to evaluate, by testing the vehicle, certain handling characteristics of the 1981 Jeep CJ-5 vehicle..." Arvin/Calspan ATC and R. S. Rice of Calspan's Transportation Research Department participated in the project.

The "Milliken-Rice Study Background Documents" attached hereto, in chronological order, make it clear that despite the claims of AMC and the study authors, the project found a severe rollover problem for the CJ under the test conditions, as well as indications for minimizing the problem. The documents are as follows:

- 13a -- Letter of January 23, 1981 from George Brown, Executive Director of Vehicle Emissions & Safety, American Motors Corporation, to Milliken Research Associates, Inc. asking for an evaluation of the October 1980 Dynamic Science report critical of the Jeep CJ-5.
- 13b -- Follow-up letter of Brown to Milliken on February 5th setting out procedure for first stage of evaluation.
- 13c -- Follow-up letter of Brown to Milliken on February 23rd extending the work agreement.
- 13d -- Letter of February 25, 1981, from George Brown to Milliken offering to extend additional contract for Milliken to "evaluate, by testing the vehicle, certain handling characteristics of a 1981 Jeep CJ-5 vehicle." Program to involve Calspan Advanced Technology Center in Buffalo, New York. Goal of program is to "learn the extent of the capabilities of the vehicle to perform on-pavement maneuvers that human beings could and might execute under both routine and emergency conditions. The maneuvers would include, but not necessarily be limited to, various turns and obstacle-avoidance actions."

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- 13e -- Proposal 6956 of Calspan dated March 1981, "to perform handling evaluation of the Jeep CJ-5 vehicle." Provides detailed description of proposed test program for "defining [the CJ-5's] stability, controllability and handling properties," including maneuvers to be carried out.
- 13f -- Letter of March 3, from Milliken to AMC incorporating Calspan proposal.
- 13g -- March 9, 1981, memorandum of R.S. Rice dated March 9, 1981, describing safety precautions for Vehicle Handling Test work on Jeep CJ. Indicates vehicles would be equipped with standard restraints and rollbar provided by AMC (optional on CJ at that time) and that padding will be added "to cover all critical sections" of the roll bar. States that following initial tests the "possibility of installing a full racing-style harness" and "adding structural elements/support" to the rollbar would be evaluated. States drivers will wear "protective headgear." Does not specify outriggers to prevent rollovers in tip-ups.
- 13h -- March 17, letter from Brown to Milliken authorizing Vehicle Handling Test by Milliken-Rice.
- 13i -- March 17, shipment of two Jeep CJ-5's and related materials to Milliken in Williamsville, New York.
- 13j -- Handwritten notes dated April 11 through April 13, by Milliken-Rice employees describing inadvertent and accidental rollover of CJ during preliminary test phase. As a result of this "accident," notes that "tight maneuvers in lane not practical (or at least compromised)." Says test vehicles henceforth will be "fit with outriggers."

States:

"In some sense, it is good that the rollover occurred because it avoids the situation of our saying that the vehicle is OK up to .6gb when, at a slightly higher value, it has problems. Also, somewhat different loading (or operating conditions) could have changed the point to a lower value where we checked it to be acceptable. We learned several things:

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"(a) One of the reasons we saw little in the DySci report to indicate wheel-lift-and-recovery would appear to be that there is no (or very little) such zone.

"(b) Exposure time to high AY may not be as significant as we suggest in our report. While instantaneous peaking above .6g may be insufficient to cause rollover (or even extended exposure - of the order of two seconds), it may be that getting just a bit more may cause divergent role. Then exposure is out of the control of the driver." (Petitioners' underline.)

(Note: Some of the copy of the above document made available to petitioners is illegible. Petitioners urge the Agency to request a legible copy of the document from Chrysler-AMC.)

- 13k -- Handwritten memo of 4/15/81 discussing need to fix outriggers on bumper of Jeep to prevent further rollover incidents and possible injury in future testing.
- 131 -- April 22, typed report on Jeep rollover during testing operations. "The specific conditions of the test run in which the rollover occurred were within experimental tolerances of those conditions for which several previous runs had been performed without incident."

Also notes "special safety precautions" present in the vehicle, including a "full racing harness" and strengthened rollbar structure.

- 13m -- List of Jeep testing through May 5, 1981 which resulted in tip-ups of the Jeep CJ-5, i.e. potential rollovers except for outrigger protection. A total of 33 tipups are listed, all but two at speeds lower than 30 mph.

- 13n -- Handwritten draft of Vehicle Handling Test (VHT) Program of the American Motors 1981 Jeep CJ-5 (May 1981). "It was observed that as the [vehicle's lateral force] limit was approached large lateral tire deflections occurred (notably on front) and the tire partially rolled onto the side wall. Although

the investigation of this phenomenon was beyond the objectives of the present program, there is some reason to believe that this may be responsible for the development of sufficient lateral force to roll the vehicle over." (Petitioners' underline.)

(Note: Petitioners request that the Agency inquire as to what follow-up actions, if any, have been taken by AMC or Chrysler in response to the above finding.)

130 -- Uncorrected copy of Vehicle Handling Test (VHT) Program of the American Motors 1981 Jeep CJ-5 by Milliken-Rice prepared for AMC General Counsel. States: "When the limit [of .7g's] is exceeded the vehicle rolls over with no prior tendency to either spin or plow. However, the amounts of control movement and effort required to initiate rollover of the vehicles as tested in the 90 degree and J-turn maneuvers on smooth dry pavement are well beyond what will reasonably be employed by average drivers on the highway." (Petitioners' emphasis.)

Also: "One vehicle rolled over and simulated rollovers or tip ups (outriggers installed) were performed with a second vehicle on over 45 occasions in 90 degree and J-turns...Numerous tip-ups were performed between 25 and 35 mph...It was possible in the speed range 22 to 35 mph to consistently achieve rollover/tip ups..."

And: "In general, the data from the present tests confirm the analysis of the Dynamic Science tests in that very large steering angles are required to roll over the Jeep CJ in 90 degree and J-turn maneuvers. Furthermore, that at speeds under 25 mph the input rates must be high if speed fall-off at constant throttle is to be minimized. What the present tests add to the picture is the actual experience of making these inputs manually as opposed to the use of an automatic controller as in the Dynamic Science tests."

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- 13p -- Agenda of May 8, 1981, meeting between Milliken-Rice and representatives of AMC. [NOTE: Uncorrected copy of study as well as Agenda make reference to unplanned rollover of Jeep CJ during testing; and unfavorable findings related to safety in paragraph 9 on page 5].

States on page 3: "While the behavior of the CJ-5 in rollover mode is now adequately documented in the 25 mph range, it is not yet fully understood. There is evidence that the large tire distortion of the outside front wheel is influential." Also states under "poor characteristics" on page 4: "When driving from dry to icy pavement, the blue CJ-5 consistently tended to swap ends." Also states: "Tip-ups (simulated rollovers) can be performed consistently (i.e., repeated a large percentage of the time.)"

- 13q -- May 11, 1981, letter from Milliken to AMC containing invoice for completion of Stage II and for confirmation that Level 3 work is continuing on the following project: "Specifically, American Motors (AM) wishes to learn the capabilities of the Jeep CJ-5 to perform on-pavement maneuvers that human beings could and might execute under both routine and emergency conditions."

- 13r -- May 12, 1981, handwritten notes of Milliken-Rice confirming the test findings that there is front wheel lift-up of the Jeep CJ-5 in a circle test at .6gs, inside wheel lift at approximately .65gs and rollover at about .75gs.

The defensive character of the project is indicated by the following statement in the notes: "It is very likely that the report will be examined very critically by plaintiff experts. We must be sure that we won't be second-guessed on our treatment of the data, our computational methods, corrections to measurements."

- 13s -- May 12, 1981, letter from Brown to Milliken repeating objectives of AMC from the Milliken-Rice testing.

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- 13t -- May 29, 1981, letter of Milliken to AMC explaining need to increase budget.
- 13u -- Corrected copy of the Vehicle Handling Test report after visit to Milliken-Rice by AMC attorney Ken Gluckman on June 5, 1981.
- 13v -- Handwritten notes of Milliken-Rice related to rollover testing performed by AMC in-house lawyer Ken Gluckman (June 9, 1981). Notes for "Gluckman runs" during test program: "cheated in rt X turn (impacting lane cone)..."
- 13w -- June 16 and 17, correspondence from Brown to Milliken concerning increased budget.
- 13x -- July 2, 1981, letter from Brown to Milliken "to summarize the nature" of the Vehicle Handling Test Program "that you have been conducting," including attached handwritten notes of Roy Rice containing "some key questions which could be asked," including:
- "1. Although you say that rollover can't occur when the maneuver is properly executed, what about the situations in which it is not? Suppose the driver does get enough steering in and panics and keeps it in, what then?"
 - "2. Isn't it true that the Jeep CJ-5 has a high value of cg height/tread ratio compared with passenger vehicles? Can you tell me what the consequences (implications) of that are? Or, doesn't that mean it is more likely to roll over when tripped than one with a low value?"
 - "3. Would you buy a CJ-5? Would you let your [loved one] drive a CJ-5?"
- "We must make some strong points with George [Brown of AMC] re, 1., the CJ-5 may be stiff in ride; it is not particularly stiff in roll. It almost seems to me that the stabilizer bar may be on the wrong end."

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- 13y -- July 1981, final version of Vehicle Handling Test (VHT) Program of the American Motors 1981 Jeep CJ-5.
- 13z -- September 1, letter from AMC senior attorney Ken Gluckman to Milliken acknowledging August 3, letter of Milliken to George Brown desiring AMC's litigation support business, but stating AMC's "intention to use our Special Counsel Joscelyn & Treat, to coordinate most of the technical research that may be necessary or desirable."
- 13aa -- Letter from Milliken to Brown September 4, 1981, providing final billing and explaining on page 2 that the "increase is associated with the extensive proofing and reworking of the final report..."
- 13bb -- September 4, 1981, letter of Jeep Corporation to National Highway Traffic Safety Administration. States on page 4, paragraph 3, that a copy of the Milliken-Rice report is included as attachment 8. Explains that the results of the tests were that the Jeep CJ-5 "provided an operating envelope that is adequate for safe use in both normal and emergency on-road operation."
- 13cc -- Letter from Brown to Milliken October 12, 1981, explaining that on August 11, 1981, AMC released the Milliken-Rice report from its confidential status. It further states that Milliken is to speak to no outside interests about the Jeep CJ testing except through the authorization by Joscelyn & Treat law firm or senior attorney Ken Gluckman.

DOCUMENT #14

February 12, 1981: Memo and charts from Renneker to Lunn, MacAfee, Dawkins, showing "rollover" as a category of "customer problems" that require "1982 product changes" involving "increase track, lower c.g., improved sway bars."

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DOCUMENT #15

March 26, 1981: Document entitled "CJ Replacement Study" and carrying names of Renneker, Al Hamilton and Ray Rowell. "Must" features listed in the study include: "Fixed Windshield and Full Roll Cage". "Additional Desirable Features" include "Full Restraint System for All Occupants." Attachments discuss "dimensions critical to performance" of the CJ Replacement, noting that "Less Track = Too Low a Value of Lateral G Limit With Practical CG Height."

DOCUMENT #16

May 27, 1981: Notes dictated by Thornton while performing CJ-5 handling maneuvers with various sizes of tires, with attachment re resulting rollover performance. Experiences many tip-up (rollover) events. Finds that reducing tire size reduces rollover propensity, i.e., "no problems at all" with the P195R15 Arriva tire at speeds up to 40 miles per hour.

(Petitioners believe that these results are important in the context of possible defect recall-repair steps that Chrysler-AMC could have taken and could take even now to reduce the likelihood of rollovers of CJ vehicles still on the roads, such as by providing them with smaller tire/wheel combinations that would lower their center of gravity.)

DOCUMENT #17

November 19, 1981: Memo from R.M. Huffstutler to R. Fielding listing roof crush tests that may have "either films or photographs," including tests indicated as SLT 13.193, 13.230, 13.231A, 13.231B, 13.231C, 13.232, 13.236, 13.240, 13.244, 13.254, 13.255, 13.257, 13.258, 13.267 and 13.268, covering a period from 9-17-76 to 12-05-79.

DOCUMENT #18

January 7, 1982: Memo from R.M. Huffstutler to J.E. MacAfee, re CJ Shackles. Memo notes that an upcoming test, 1509, will be the fourth in a series for this part. "Upon successful completion of testing on the new shackle design, we would appreciate the ECR [Engineering Change Request] being with obsolescence [sic] and the new design being incorporated at the earliest possible time."

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Says that assuming the shackle is released, "I will press for retrofit of all CJ-7 and Scrambler vehicles produced in the 1982 model year. This action I believe is warranted since the FMVSS 301-75 movable barrier 20 mph test which indicated a problem was completed July 22, 1981, three weeks prior to the 1982 production. Not to retrofit will subject Jeep Corporation to possible punitive damages on a component which has previously been the subject of several causes of action." It adds, apparently with reference to "our legal staff", that, "Any action by Engineering to our purchasing group to forestall their dilatory action in this matter would be greatly appreciated."

DOCUMENT #19

January 8, 1982: Engineering Change Request No. 82J2720, "Improved Spring Shackle," dated January 8, 1982 with a submission date of January 14, 1982, requested by W. Grubaugh, approved by A.C. Turner, and given preliminary and final approval by R. Kamm. Covers a number of spring shackle components.

DOCUMENT #20

January 18, 1982: Memo from R.M. Huffstutler to C.S. Sklaren, re CJ Shackles, stating: "We have completed with your request concerning document 102v dated January 7, 1982 with the exception of your document [sic]. I trust the action with the vehicles will be as successful."

DOCUMENT #21

January 18, 1982: Memo from R.M. Huffstutler to C.S. Sklaren, re CJ Shackles, attaching copies of 82J2720; same report, with an additional notation at the bottom: "Reissued: Removing Emergency Status."

DOCUMENT #22

February 9, 1982: Memo re ECR 82J2720, from R.M. Huffstutler to M. Kamm, expressing "concern regarding ECR Status." States that because of the reissue "the change is at a 'C' level which I understand means that the change must be incorporated as soon as possible with obsolescence or rework. You are of course aware of the practical effect of your change."

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"For our records, please provide the rational [sic] for the original emergency change and the great parameter change that formed the basis for downgrading the change to 'C'."

DOCUMENT #23

February 9, 1982: Memo from DeRees to Thornton, etc., "Meeting Minutes, CJ-Replacement" concerning "concepts and feasibility of a wide variety of CJ-replacement alternatives." Attached "confidential CJ replacement design study" notes:

"[A stability factor of] 1.19 is considered minimum acceptable factor." (CJ-7 factor was 1.07; CJ-5 factor was 1.01.)

Calls for widening track, lowering cg. Includes as "desired features" non-folding windshields "with side roof rail supports to rollover protection at 'B' pillar area," and "Roofs - Improved Over CJ-7 Standard Roof - is a two piece hardtop unit" for greater rollover protection.

DOCUMENT #24

February 22, 1982: Memo from C.E. Merritt to R.M. Huffstutler, re ECR 82J2720, describing "ongoing metallurgical quality problems" for the "current shoulder type shackle pin," but "only as an in-house problem." Adds that with the "larger possible lateral displacement of the new 1982 CJ-7 and Scrambler axle, a shackle bolt construction providing a lower resultant stress level was desired."

"ECR 82J2720 was processed releasing a new higher grade material thru bolt and spacer. It was inadvertently released with emergency status which was immediately corrected. The code 'C' classification mandates priority consideration."

DOCUMENT #25

March 1, 1982: Memo from R.M. Huffstutler to W.C. Jones, re ECR 82J2720, stating that he is in receipt of the Merritt memo, which "fully explains all outstanding questions concerning shackle changes on ECR 82J 2720."

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DOCUMENT #26

March 12, 1982: "All New CJ-Replacement," Memo from Advanced Vehicle Engineering. Lists as "Advantages" the following:
"Improved ride & handling - longer wheelbase - low center of gravity - wide track...integrated roll cage...two piece hardtops (front and rear) opt..."

DOCUMENT #27

April 1, 1982: "CJ Forward Product Plan Review," an AMC Product Committee report. Introduction states:

"Even though [the CJ] is designed as the 'ultimate' off-road vehicle, it is used on-road the vast majority of the time. It has become relatively high-priced, yet its buyers are traditionally very young. It has a very positive image, but it is technically a very crude vehicle...The Jeep CJ is basically a crude, expensive, ill-mannered, well known, charming unique product...it is hard to imagine that this crude, unforgiving, technically ancient product can continue to be sold indefinitely. Price, challenges about stability, added competition, and changing customer priorities do not bode well for current CJ products." (Petitioners' emphasis.)

An attached "Advanced Vehicle Engineering, CJ-II Proposal," lists specific CJ-5, 7 Deficiencies to be Corrected," including:
"Handling, stability, rollover characteristics ...steering response - lag, stickiness ...roll bar characteristics..." Lists "new product" features to be added, including "integrated roll bar, hard doors..." Attached "stability" table shows 1980 CJ-7 as having lowest "relative roll" stability of all listed vehicles sold in the U.S. market, "CJ-II" proposed vehicle as having substantially higher stability.

DOCUMENT #28

April 1982: "CJ Improvements for Future Face Lift Program," including "provide improved rollover protection" and specifying needed changes in windshield frame design, roll cage structure, doors, and "second seat" occupant protection.

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DOCUMENT #29

April 2, 1982: CJ Meeting Notes, "Needs For Legal Status - Improvements, Ref. CJ-7," listing as "CJ-7 Improvement" the following:

"Lower c.g. of total vehicle, provide protection - improved rollover" including "w/shield intrusion - roll cage w/s strut between...add hard doors as std., consider rear occupant - roll over protection..."

DOCUMENT #30

April 6, 1982: Memo from Thornton, "CJ-7 Improvement," calling for "Lower cg. of total vehicle, provide improved roll-over protection" including limiting windshield intrusion and adding hard doors, "consider rear occupant - roll over protection," .

DOCUMENT #31:

May 3, 1982: Memo from DeRees to Thornton, "Future CJ Refreshen Concepts," noting discussion of lowering the vehicle's chassis and body height and overall vehicle height, adding "all-new windshield frame, roll bar, roofs, doors, etc...."

DOCUMENT #32

May 17, 1982: Memo from Thornton, "CJ Evaluation," stating "...it is believed that the [rollover] accidents are the result of emergency situations where the driver loses control of the vehicle and the vehicle then leaves the road and crashes. Examples of emergency situations would be a patch of ice on the road, a vehicle blocking the road, a panic brake application, etc. etc."

DOCUMENT #33

June 28, 1982: Memo from Thornton, "Proposed Changes for CJ Freshening Program," includes as program goals "improved occupant protection," says possible changes would include lowering center of gravity, using small front sway bar, "provide struts from roll bar to the windshield frame...hard doors to be standard."

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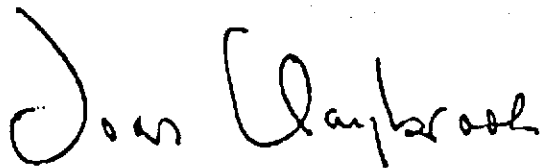
DOCUMENT #34

July 6, 1982: Memo from Renneker to Dawkins, "Proposed Design Objectives - Future CJ Replacement," noting that "It is mandatory for product liability in the U.S. market" under the heading, "Handling - On Road Handling & Stability..." Under "Upgrade Off-Road Safety," calls for "full surround roll cage structure, all potential head impact surfaces smooth. High potential surfaces padded." Describes optional full restraint system.

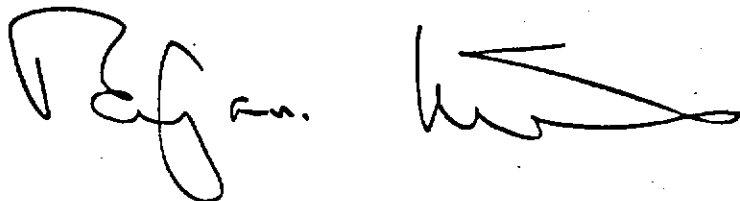
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It is estimated that as many as 400,000 Jeep CJ vehicles remain on the highways. This year alone they will kill hundreds of Americans, and injure thousands. We urge NHTSA to move quickly to have these vehicles recalled and corrected so as to reduce their unduly high propensity to roll over and to provide sufficient protection for their occupants.

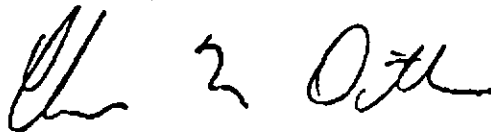
Sincerely,



Joan Claybrook
Public Citizen



Benjamin Kelley
Institute for Injury Reduction



Clarence Ditlow
Center for Auto Safety

Attachments