



State of New Jersey

2/18

DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF MOTOR VEHICLES

25 SOUTH MONTGOMERY STREET
TRENTON, NEW JERSEY 08666

IRWIN I. KIMMELMAN
ATTORNEY GENERAL

FILE
CLIFFORD W. SNEDEKER
DIRECTOR

June 29, 1984

02-20-NOZ-003

Ms. Elizabeth Dole
Transportation Secretary
U.S. Department of Transportation
400 Seventh Street, South West
Washington, D.C. 20590

ACTION
is assigned to
NHTSA
CONTROL NO.
8407060203
SAMIS S-10

Dear Ms. Dole:

I would like to take this opportunity to enlist your assistance in pursuing our common goal of increased highway safety. I recognize and appreciate your efforts in attempting to promulgate regulations and standards which afford the maximum safety benefit with minimum cost incurred.

Since the popularity of four-wheel-drive vehicles has grown to the point that there are now over 50,000 registered in New Jersey, I have a specific concern regarding a recent National Highway Traffic Safety Administration ruling regarding utility vehicles. NHTSA 16-84 was issued on May 11, 1984, and requires manufacturers to affix appropriate labels to these vehicles warning the drivers of their unique handling characteristics and the inherent danger of roll over.

Although this is a step in the right direction, it is my opinion that NHTSA has not gone far enough and additional measures are necessary to improve the safety record of four-wheel-drive vehicles.

The conclusions we have reached as a result of our experiences with these vehicles are in agreement with the results of recent studies conducted by the University of Michigan and the University of North Carolina. These comprehensive studies have raised serious questions regarding the safety and stability of pickup trucks and utility vehicles. The problem is compounded by the fact that many of these vehicles are being modified so as to raise the center of gravity.

In view of the seriousness of this matter, I am requesting that NHTSA give consideration to tightening up the regulation governing these vehicles.


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The measures listed below are recommended:

1. Performance and design standards should be formulated with an emphasis on roll stability and occupant safety.
2. Additional efforts should be made to alert the public regarding the dangers of these vehicles. Specific warnings explaining these dangers should be issued to purchasers, automobile clubs, insurers and educators. Manufacturers should be required to include appropriate warnings in their advertisements directed toward four-wheel-drive vehicles.
3. The warning, NHTSA 16-84, now required to be posted in utility vehicles should also be required in four-wheel-drive pickup trucks which have similar handling characteristics. These warnings should include the dangers of certain modifications such as bigger tires, suspension lifts, etc.
4. Federal Motor Vehicle Safety Standards which only apply to passenger vehicles should be extended to include utility vehicles and pickup trucks.

The implementation of these measures would certainly be a significant contribution to safety. Any assistance you can offer regarding this matter will be greatly appreciated.

Sincerely,


Clifford W. Snedeker
Director and Governor's Highway
Safety Representative

CWS:bg