



U.S. Department
of Transportation
National Highway
Traffic Safety
Administration

Office of the Chief Counsel

7
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Mike:

I strongly recommend that this paper not be presented at the SAE meeting, because of its relationship to Senator Wirth's petition on vehicle rollover. The very first sentence of the abstract states that statistical confirmation of the relationship between rollover stability and rollover risk has been established. Such a statement is the basis explicitly set forth in the Wirth petition for the requested rulemaking and defect investigation on vehicle rollover.

The agency response to the Wirth petition will have to address all of the issues raised therein, including the relationship between rollover stability and rollover risk. As you know, NRM circulated a draft response recommending that the Wirth petition be denied. That draft stated that the relationship between rollover stability and rollover risk was not statistically shown. The agency will have to resolve this difference of opinion between your office and NRM to allow us to formulate our response to the Wirth petition. After the agency has resolved this internal disagreement and published its response to the Wirth petition, you may wish to revise this paper to reflect the agency position on this issue. Even if the agency ultimately adopts the position set forth in this paper, it would establish an unwise policy and management course to publish this paper, addressing the key point of the Wirth petition, before we have officially responded to the petition.


Steve Wood