

W. H. MECHERLE

JUN 19 1990

INSURANCE  
INSTITUTE  
FOR  
HIGHWAY  
SAFETY

L. SULLIVAN

JUN 15 1990

*Copies to: Boardau  
Bunner  
Ingham  
Mecherle  
Perry 6/15/90  
Pantley*

MEMORANDUM TO: IIHS Board of Directors  
ELDI Board of Directors

FROM: Brian O'Neill *BO*

SUBJECT: Competitive Parts: New Safety Charges

DATE: June 13, 1990

At a recent congressional hearing, NHTSA Administrator Jerry Cuxry was questioned about the "safety" of competitive crash parts by Representative Bob Carr from Michigan. The line of questioning was a surprise to Curry and he promised to look into the matter. Shortly thereafter, NHTSA's Office of Vehicle Safety Compliance wrote to the three domestic vehicle manufacturers asking them to provide any information they have concerning safety problems with competitive crash parts. Since NHTSA was not familiar with our work in this area, we have submitted the attached letter together with detailed backup to NHTSA.

Yesterday, General Motors (GM) presented NHTSA with some new allegations of safety problems with competitive hoods. Specifically, GM claims to have identified competitive hoods with an insufficient number of welds that could affect the controlled buckle of the hood in a frontal crash; hoods without a prop rod hole making it hazardous for someone working on the engine to safely prop open the hood; and hood attachment hardware that may not be adequate to prevent hood penetration of the windshield in a frontal crash. In addition, GM expressed concern that one parts distributor may be considering selling replacement passenger car doors without side guard beams...

As our work on the safety of competitive parts indicated, because of the federal standard on hood intrusion, it is not possible to unequivocally state that there could not be safety problems with some competitive hoods, even though the competitive hood we used on the Ford Escort in the compliance tests performed as it should have. Also at the time we did our testing, there was no competitive hood attachment hardware available. It was our assumption that such hardware could only be purchased from the original equipment manufacturers. These GM allegations may have sufficient validity to lead to recalls and/or rulemaking.

RECEIVED  
JUN 27 1990  
DETROIT TESTING LABORATORY