

Howell, Rosa (NHTSA)

From: Clarence Ditlow <cmdiii@autosafety.org>
Sent: Wednesday, May 23, 2012 10:28 PM
To: Borris, Frank (NHTSA); Yon, Scott (NHTSA); Hershman, Larry (NHTSA)
Subject: Letter to Administrator Mailed This Afternoon By Priority Mail
Attachments: Strickland May 2012.doc

FYI.

Clarence Ditlow

Executive Director

Center for Auto Safety

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CENTER FOR AUTO SAFETY

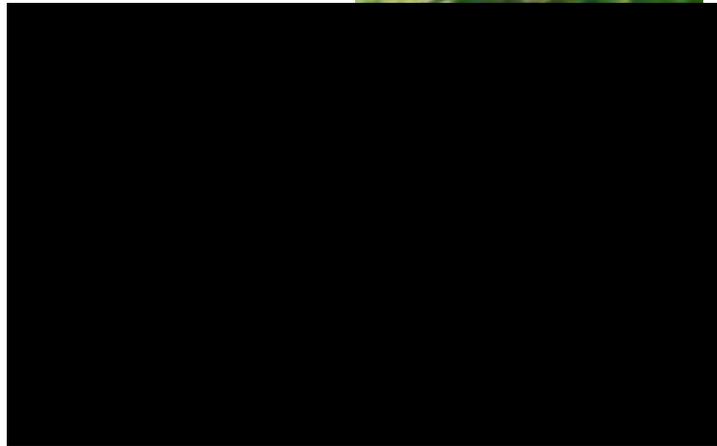
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May 23, 2012

Honorable David Strickland, Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Avenue SE
Washington DC 20590

Dear Administrator Strickland:

In NHTSA's history of defect investigations and recalls, there has never been one where four year old children in child restraints have burned to death in fire crashes until now. On February 12, 2006, four year old [REDACTED] was killed despite riding in a child seat to protect her when the 1993 Jeep Grand Cherokee driven by her mother was struck from behind and burst into flames. On March 6, 2012, four year old [REDACTED] was killed despite riding in a child booster seat to protect him when the 1999 Jeep Grand Cherokee driven by his aunt was struck from behind and engulfed in flames.



The other occupants in the crashes could not get the above pictured four year olds out because they were trapped in the flaming vehicle. [REDACTED] is but the latest fatality in 201 fatal fire crashes with 285 deaths involving 1993-2004 Jeep Grand Cherokees.

Chrysler's David D. Dillon has now admitted what the Center has said all along – the 1993-04 Jeep Grand Cherokee far exceeds its top competitor, the 1993-04 Ford Explorer in most harmful event (MHE) rear impact fire crashes. (Attachment A - Deposition in Kline V Lohman Auto Group.) Mr Dillon also disclosed that the April 6, 2011 presentation to NHTSA on FARS was not prepared by Chrysler but rather was prepared by Exponent Failure Analysis which made such a misleading analysis to NHTSA in the GM pickup side saddle gas tank investigation that GM Vice President Harry Pearce apologized to NHTSA Administrator Marion Blakey for the presentation. (Attachment B.)

The April 6 FARS analysis shows a MHE fire rate of 0.44 crashes per million years of use compared to 0.022 for the Ford Explorer based on 12 Grand Cherokee MHE rear fire crashes and 1 Ford Explorer MHE rear fire crash. The analysis does not include the July 10, 2009 TX MHE rear fire crash (FARS 481432 – Attachment C) so the 1993-04 Grand Cherokee MHE fire rate is 0.48 per million years of use which is 22 times higher than the Ford Explorer. With 18 deaths in the 12 MHE Jeep crashes, the difference is even higher than 22 to 1.

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The FHWA and KARCO crash tests of the Jeep Grand Cherokee and Ford Explorer fully support this 22 to 1 greater MHE crash fire rate for the Grand Cherokee versus the Ford Explorer. The crash tests done by FHWA and CAS show the Grand Cherokee suffered a catastrophic fuel system failure at energy levels both significantly below present FMVSS 301 levels. Yet the Ford Explorer suffered no breach of the fuel system in a 70 mph FHWA crash test with an energy level nearly twice that of FMVSS 301.

Test	Impactor	Impactor Weight	Impactor Speed	Crash Energy
old FMVSS 301	flat face barrier	4,000 pounds	30 mph	121,000 lb-ft
new FMVSS 301	contoured barrier	3,015 pounds	50 mph	253,000 lb-ft
FHWA Explorer	2003 Taurus sedan	3,110 pounds	68 mph	483,000 lb-ft
FHWA Grand Cher.	2000 Taurus SW	3,296 pounds	49.7 mph	274,000 lb-ft
Karco Grand Cher.	1987 Taurus sedan	3,387 pounds	51.4 mph	301,000 lb-ft
Karco Grand Cher.	1988 Taurus sedan	3,364 pounds	40.7 mph	187,000 lb-ft

If Chrysler does not voluntarily recall these deadly vehicles that kill children secured in child restraints as the Center has asked Chairman Sergio Marchionne, then the only way to prevent more fire deaths is for NHTSA to order a mandatory safety recall and require Chrysler to design an effective remedy for any vehicle outside the repair for free provision of the Safety Act.

Sincerely,



Clarence Ditlow
Executive Director