

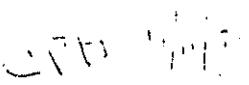
~~It is important to note that General Motors Corporation (GM), in a letter dated November 10, 1970, has indicated they will implement certain changes in their proposed standard relating to pre-accident latch criteria to the mandatory standard requirement of transportation. In regulations, however, still fall under demonstration tests.~~

~~It is also important to note that certain testing procedures provided are based upon the test conditions relative to the window of the bus, and do not include forces or deflections of the window frames which may tend to unload a window. It is noted that deflections of the window frames as a result of an accident can affect structure. Accident reports which have been reviewed by the Safety Board, do not indicate definitively whether the window frame deflections have occurred, were caused by such deflection or by pressure of the front of the bus nose碰 against the windows. However, the Safety Board has been one finding bus nests in which bus windows on one side had broken before the bus had subjected to any crash impact. This situation occurred when a bus was driven off the pavement onto a slope & stopped in such a way that the bus was supported mainly on the left front and right rear wheels. It is noted that with the increased use of picture windows in buses, the size of the window openings has been increasing. Conceivably, this could make the latents increasingly sensitive to being opened by large-scale distortion of the structure.~~

The National Transportation Safety Board recommends to the National Highway Traffic Safety Administration:

- 1) That those portions of the proposed motor vehicle standard for bus window retention and release which relate solely to the prevention of unwanted window opening and passenger ejection be retained in the final standard adopted.
- 2) That those portions of the proposed motor vehicle safety standard for bus window retention and release which deal with access to the windows and other aspects of escape be replaced by a new performance standard based upon demonstration testing of escape. As recommended in serial safety Board reports, such demonstration tests should include the full range of passenger body types, positions in which buses may rest following an accident, and the range of environmental conditions actually met in service.
- 3) That tests already conducted by bus manufacturers involving bus structural deflections resulting from real loads, such as encountered in running off the road, be reviewed, and, if indicated, additional tests to guard against inadvertent opening of the windows by structural deflections be placed on the requirement.

Sincerely,
Original signed by
John H. Reed


John H. Reed
Chairman

cc: NC-1(2), NI-2, NM-3, NI-4, NI-5, NE-1, NG-1, NP-1, NS-1, NS-2,
NE-51, NE-515, NS-10(9717117), NOTATION NO. 705-A, Approved by
the Board November 10, 1971. Hoffmann:alw:NS-10:10/11/71