



EXECUTIVE OFFICE OF THE PRESIDENT  
OFFICE OF MANAGEMENT AND BUDGET  
WASHINGTON, D.C. 20503

JUN 28 2002

ADMINISTRATOR  
OFFICE OF  
INFORMATION AND  
REGULATORY AFFAIRS

The Honorable Jeffrey W. Runge, M.D.  
Administrator  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, DC 20590

Dear Dr. Runge:

I am writing to thank you and your staff for making significant improvements in the Economic Assessment of the recently adopted final rule requiring tire pressure monitoring systems for new motor vehicles. I would also like to suggest some longer-term research directions that may strengthen the scientific basis of future vehicle safety rulemakings.

First, OIRA appreciates the significant improvements NHTSA made in the regulatory analysis. Those improvements include (1) an explicit cost-effectiveness analysis of a 1-tire standard, including a comparison of costs and safety impacts compared to a 4-tire standard, (2) a significant discussion of the ABS safety issue, including a careful summary of the real-world crash data concerning the safety impacts of ABS, and (3) a qualitative discussion of some of the technical uncertainties in the agency's estimates of the safety benefits that could be expected from various tire-pressure monitoring systems.

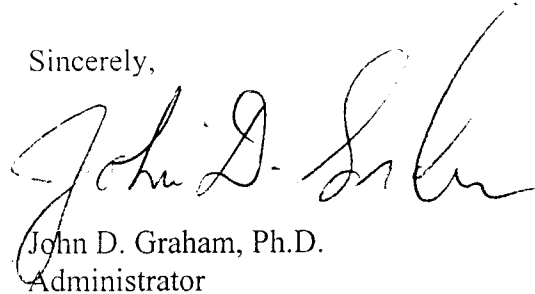
Recognizing the limitations in current knowledge, we are eager to work with NHTSA between now and March of 2005, when more information will be available and a final decision will be made on this matter for model years 2007 and later. We are pleased that NHTSA agrees upon the need to analyze all options and information about the safety impacts of ABS, regardless of whether such information is judged to be relevant to this rulemaking or a separate rulemaking. We believe that further improvements in NHTSA's economic assessment of the tire-pressure monitoring issue will result from the collection and development of additional information between now and March of 2005. OIRA wants to work closely with NHTSA to develop analysis sufficient to inform and support NHTSA's ultimate decision in this important rulemaking.

Second, in the course of reviewing this particular rule, OIRA encountered a research gap that, if filled, would provide a stronger technical foundation for future vehicle- and tire-related rulemakings at NHTSA. The 1977 "Indiana Tri-Level Study" was a seminal effort to quantify the relative frequency of different causes of crashes. However, much has changed in the past 25 years. For example, minivans and SUVs were virtually nonexistent in the mid-70's, as were front-wheel drive vehicles and radial tires. These changes raise questions about the continuing validity of the Indiana Tri-Level Study's findings about the relative frequency of different causes of crashes. However, there has been no subsequent comprehensive study of crash causation.

We know that NHTSA is now responsible for conducting a crash causation study for large trucks and that you are exploring the possibility of building on that work to do a broader crash causation study. Such a study would allow us in the government to better understand the safety payoffs and costs associated with initiatives in the area of crash avoidance, such as enhanced tires, braking, and handling performance. It would also give us a stronger basis for setting priorities in this area. My staff and I would like to meet with you and your staff to discuss the potential value and costs of a comprehensive crash causation study.

We thank you again for being responsive to OIRA's concerns and we look forward to discussions with you regarding both research gaps and the analysis necessary to support future rulemakings.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Graham".

John D. Graham, Ph.D.  
Administrator  
Office of Information  
and Regulatory Affairs