

Jeep 

JEEP CORPORATION
14250 Plymouth Road
Detroit, Michigan 48232

August 3, 1973

FEDERAL MOTOR VEHICLE SAFETY STANDARDS

(49 CFR PART 571)

ADVANCE NOTICE OF PROPOSED RULE MAKING

DOCKET NO. 73-10; NOTICE 1

ROLLOVER RESISTANCE

Administrator
National Highway Traffic
Safety Administration
U. S. Department of Transportation
400 Seventh Street, S. W.
Washington, D. C. 20590

Attn: Docket Section
Room 5221

Dear Sir:

Jeep Corporation, a wholly owned subsidiary of American Motors Corporation and a domestic manufacturer of automobiles, submits the following comments in response to Docket No. 73-10; Notice 1, "Advance Notice of Proposed Standard on Rollover Resistance," published in the Federal Register, April 10, 1973.

Jeep Corporation does not believe that a demonstrated need exists, in terms of highway safety, for regulation of the tendency for a motor vehicle to "roll over." In fact, a vehicle's inherent tendency to roll over does not appear to be a primary contributing factor to the occurrence of vehicle rollover during a vehicle crash situation.

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An investigation of vehicle crash data indicates that, in general, vehicles do not roll over due to any inherent tendency toward rollover in the vehicle itself, but rather the rollover is a result of leaving the highway. Therefore, it would seem that the occurrence of vehicle rollover would be best reduced by reducing the occurrence of vehicles leaving the highway and eliminating the topographic conditions at roadside which induce or promote rollover.

Jeep Corporation wishes to further point out that certain classes and types of vehicles must contain a greater tendency for rollover than others as a result of practical design for their intended usage. Elimination of certain classes or types of vehicles, particularly in the truck and multipurpose passenger vehicle categories, would certainly provide a high cost to society in general for the small increase in highway safety it would provide.

In the event that rollover resistance criteria are established in the future, Jeep Corporation believes that the same minimum level of performance cannot be applied to all classes and types of motor vehicles without seriously compromising their primary usage function. That is, performance requirements should be keyed into vehicle classes such as Passenger Cars, Multipurpose Passenger Vehicles, Trucks, and Buses. Also, it is likely that such requirements would need to be further broken down into sub-classes such as light, medium, and heavy trucks.

Jeep Corporation produces four-wheel drive vehicles in both Multipurpose Passenger Vehicle and Truck classes. These vehicles are all designed for off-road as well as on-road usage. In order to provide a useful, practical vehicle for the off-road environment, Jeep must design to a different set of design criteria than those used for vehicles intended for on-road use only. The most significant difference between on-road and off-road vehicles (in terms of rollover resistance) is the ratio of center of gravity height to track width. Considerations for ground clearance and mobility require that this ratio for an off-road vehicle must be significantly greater than that for an on-road vehicle. This means that, on an absolute grading scale,

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it is likely that the inherent tendency for rollover would be greater than that of a typical passenger car. This is not to say, however, that these vehicles present any greater risk of rollover than a passenger car; and this is supported by the available crash data cited above.

In summary, Jeep Corporation believes that a need for the regulation of a vehicle's inherent tendency to rollover does not exist. Jeep Corporation further believes that considerable research will be required to demonstrate that the need for a regulation does exist and to develop information upon which to base a relevant safety standard.

Jeep Corporation has participated in the preparation of comments to this docket by the Motor Vehicle Manufacturers Association of the United States, Inc. (MVMA) and is basically in agreement with those comments.

Sincerely,



F. A. Stewart
Vice President
Safety & Reliability

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