



## **The Safety Institute**

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September 25, 2018

Heidi King, Deputy Administrator  
National Highway Traffic Safety Administration Headquarters  
1200 New Jersey Avenue, SE  
West Building  
Washington, D.C. 20590

Dear Ms. King:

In October 2015, the National Transportation Safety Board (NTSB) recommended that NHTSA, “Determine the level of crash risk associated with tire aging since the implementation of Federal Motor Vehicle Safety Standard Nos. 138 and 139; if, based on this determination, it appears that the aging-related risk should be mitigated, develop and implement a plan to promote the tire-aging test protocol to reduce the risk.” (H-15-33)<sup>1</sup> This recommendation was necessary because NHTSA had previously terminated rulemaking related to tire aging based partly on crash risk statistics and claimed reductions in tire-related fatalities and injuries that were remarkably unscientific.<sup>2</sup>

In its report, the NTSB determined that, “When compared to the estimates in NASS/GES and FARS data, the NASS/CDS data appear to underestimate the number of tire-related crashes, injuries, and fatalities. Additionally, the relatively small sample produced annual estimates that were based on very few actual crashes, resulting in unreliable estimates and trends that were more likely due to statistical noise rather than to true yearly difference. Finally, a vast majority of the fatal tire-related crashes in NASS/CDS during the period 1995–2012 were located in Arizona (41 of 64 fatal crashes), which suggests that for this particular factor, NASS/CDS did not provide a representative distribution of tire-related crashes across the United States.”<sup>3</sup>

While we are not aware of any actual work that NHTSA may have done based on methods that are scientifically defensible in response to the NTSB’s recommendation to determine the level of

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<sup>1</sup> National Transportation Safety Board, “Selected Issues in Passenger Vehicle Tire Safety,” Special Investigation Report, NTSB/SIR-15/02, PB2016-100009, Notation 8727, Adopted October 27, 2015, p. 45, <https://www.nts.gov/safety/safety-studies/Documents/SIR1502.pdf>, accessed September 5, 2018

<sup>2</sup> National Highway Traffic Safety Administration, “TIRE AGING: A Summary of NHTSA’s Work,” March 2014, p. 4, <https://www.regulations.gov/document?D=NHTSA-2005-21276-0073>, accessed September 5, 2018

<sup>3</sup> National Transportation Safety Board, op. cit., p. 57

crash risk associated with tire aging, we are aware that NHTSA is now citing on its website two new statistics that are inconsistent with previous estimates the Agency made in 2014: 1) a count of total motor vehicle fatalities in 2016 in which a contributing factor was a tire malfunction (733), and 2) the estimated number of people injured in motor vehicle crashes in 2015 in which tires were a contributing factor (19,000).<sup>4</sup> As far as we are able to determine, the new fatality count appears to be appropriately supported by data from the Fatality Analysis Reporting System.

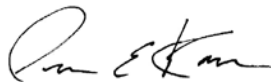
It is unfortunate that the very same web page on which these statistics are cited includes a link to NHTSA's *TireWise* page with consumer targeted tire safety information that cites statistics that are substantially at odds with the Agency's new information and repeats the same discredited estimates from NHTSA's 2014 report.<sup>5</sup>

Now that NHTSA is using an apparently defensible method to count tire-related crash fatalities, it would be appropriate for the Agency to revise its *TireWise* safety information to reflect the correct information. As long as its past undercounts of tire-related casualties are made available by the Agency over the Internet, it is all too possible that these discredited statistics might be relied upon in some future decision-making related to tire standards and foster confusion amongst consumers.

Most importantly, NHTSA must review past rulemaking decisions for tire safety that were based on data and methods that are known to be unsuited to a statistical study of this topic. In contrast to the 2014 estimates, your currently cited tire-related crash fatality statistics (733 deaths in all 2016 tire-related crashes) do not reflect a 50 percent reduction from the 1995-2006 levels NHTSA estimated in 2014 (386 deaths for occupants in passenger cars with loss of control due to a blowout or flat tire<sup>6</sup>). The Agency's review of its rulemaking should be based on scientifically plausible casualty counts and estimates of tire-related deaths, injuries, and crashes – such those it now presents to the public at some places on its website.

Thank you for the favor of a timely reply.

Sincerely,



Sean E. Kane  
President and Founder  
The Safety Institute

CC Honorable Robert L. Sumwalt, Chairman, National Transportation Safety Board

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<sup>4</sup> National Highway Traffic Safety Administration, "Tires, Overview"  
<https://www.nhtsa.gov/equipment/tires>, accessed September 5, 2018

<sup>5</sup> National Highway Traffic Safety Administration, "Be TireWise!"  
[https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/tirehome\\_eng.pdf](https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/tirehome_eng.pdf), accessed September 5, 2018

<sup>6</sup> National Highway Traffic Safety Administration, "TIRE AGING: A Summary of NHTSA's Work,"  
March 2014, p. 4, <https://www.regulations.gov/document?D=NHTSA-2005-21276-0073>, accessed  
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