

Comment from David Denker

I believe that it would be a bad idea to grant this petition and that NHTSA should not consolidate the petitions.

Main Reasoning: Many of the older vehicles affected by the existing petitions are aging into the time period where the inflator issues are primarily focused on. Thus, any further delay for the older vehicles could easily result in the latent risk maturing during the delay.

Secondary reasoning. Many vehicle owners have a vehicle that has been under a recall notice for a long, long time. Further delay---without a compelling reason---is fundamentally unfair.

While consolidation may seem to reduce efficiency, it would likely have the reverse effect. Adding vehicles may introduce new variables that would require consideration for only a portion of the vehicles---thus adding complexity to the analysis and decision. To the extent that common issues predominate, a future ruling on the the newer vehicles can incorporate as much of the earlier analysis and rationale as is appropriate.