Federal Register Document Number: 2019-12869
Summary: Request for Public Comments in Petition from General Motors, LLC to delay recall of Takata airbags used in GM vehicles with evidence from inclusive scientific testing.

Agency: National Highway Traffic Safety Administration (NHTSA)
Parent Agency: Department of Transportation (DOT)
Date Published: Jun 18, 2019
Docket Number: NHTSA-2016-0124-0246

Action:
Notice of request for public comments

Action Reply: Public Submission
Date Posted: Jul 10, 2019
Comments Submitted By:
David DeVeau
DEVCO Design & Development
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Attachments: (File Name)
DOT-NHTSA-Airbag-Recall-Delay-Petitions_David-DeVeau.pdf
DOT-NHTSA-Airbag-Title-49-Amendments_David-DeVeau.pdf

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Introductory

The following public comments are not intended to address the approval, postponement or rejection of this petition. These comments are only within the capacity of an independent advocate for public safety.

This petition is for exemption of airbag recall in certain vehicles listed by Takata that use ammonium nitrate as the explosive chemical composite to force air to fill the bag without the use of a desiccant chemical to help stabilize the explosive characteristics.

The primary concern; is that the characteristics of ammonium nitrate increase explosive force with age that is accelerated with moisture.

The secondary concern; is that desiccant drying chemical additives have limited cycles of absorption and saturation of moisture.

The question; is the design capable of handling all the conditions of the safety feature intent as per the Title 49 Standard at the time of manufacture and over the life cycle of the road safety component.

49 USC §571.208: Standard No. 208: Occupant Crash Protection

S9.2 Explosive devices. An explosive device shall not exhibit any of the characteristics prohibited by § 173.54 of this title. All explosive material shall be enclosed in a structure that is capable of containing the explosive energy without sudden release of pressure except through overpressure relief devices or parts designed to release the pressure during actuation.

Conclusion

The principle of the airbag started when a seaman observed an air tank blow under a canvas tarp and how the air filled tied down canvas blanket had cushioned the forces during and after the explosion.

The airbag was first filled with released stored air from a pressurized tank of air and is now filled with electrically activated chemical explosions within an enclosure that forces air to fill a pillow for crash protection.

This petition with supporting registered documents basically state when presently successful designs by GM are scientifically compared to related failures of other manufacturers such as Honda that General Motors, LLC has proven ability to date to contain the negative aspects of ammonium nitrate without a desiccant additive within a range of life expectancy for their designed airbag enclosures and is hereby willing and able to accept all civil liabilities.

If GM has this much confidence in their enclosure and the quality control required for ammonium nitrate chemical storage and the assembly and handling of crash safety airbags supplied by Takata and there is no contrary evidence to date than the NHTSA must accept this petition to delay, for now!

Going forward instead of asking lawyers how far can manufacturing push profits before pressing regulations, the engineers should be asked how to improve language in the regulated design standards to close the loopholes that compromise inspiration of innovations for everyone to compete with proven higher safety at higher speeds.

Chemical composites must be defined in the airbag design standard for characteristics to decrease force of air with age in an aging enclosure and to not be of poisonous or caustic characteristics that must be proven to satisfy life cycle expectations of safety.

Further consumer safety can be clearly conveyed throughout the life cycle of registered road vehicles with a VIN based NHTSA Certified Safety Inspection as shown with these following Sticker Examples.

Safety Sticker Examples

PASS

FAIL

DOT / NHSA

Road Worthy Inspection Safety Sticker

Safety Sticker Premise

Quarterly Sticker Colors:
January, February, March / BLUE
April, May, June / GREEN
July, August, September / YELLOW
October, November, December / BROWN

High Priority Recall: FAIL
Next Quarter / Repair or Replacement of Safety Feature Required
During the next three months and no more than six months
Same year, next quarter sticker is used

Low Priority Recall: FAIL
Next Year / Repair or Replacement of Safety Feature Required
During that year and no more than fifteen months
Next year, same quarter sticker is used

No Recall: PASS
Next Road Safety Inspection Per Year and Quarter on Sticker
After that year and no more than fifteen months
Next year, same quarter sticker is used

Definitions:

A High Priority Recall is defined as ***a life threatening safety feature design failure*** and parts and/or repair procedures are available.

A Low Priority Recall is defined as ***a potential life threatening safety feature design failure*** and/or parts or repair procedures are not available.

A Passing Sticker indicates that there is ***no known potentially life threatening safety feature design failures***.

Summary

Presently most states that require yearly safety inspections only allow up to sixty days to repair or replace failed safety features.

This federal system will allow more than three months and up to six months for high priority failures and upward of fifteen months for a low priority potential failure to repair or replace or to get an extension until parts are available with a rejection sticker.

The time frame for a failed low priority and a passing sticker is the same before the next inspection is due that will link to the system per Vehicle Identification Number (VIN). However the difference is very significant for consumers to remind us every time we see the fail sticker that the vehicle has a potential safety issue and for manufacturers that have vehicles on the road with these failed safety features to hasten means to resolve the issue before the next NHTSA Safety Inspection.

Specifically to this and like petitions, since it is clearly acknowledged that the Takata Airbags with ammonium nitrate are potentially deadly, that all vehicles that contain these devices shall be rejected as not road worthy. However these and other GM vehicles using the GM enclosure design manufactured by Takata listed without desiccant will have a low priority recall safety sticker due to evidence provided as indisputable to date.

Further this safety inspection system will ensure all vehicles with a high priority recall or a present quarter fail sticker can not be sold, leased, or rented and is a clear solution for assuring our vehicles are safe and the vehicles on the road with us are also road worthy.

References

Attached:

DOT-NHTSA-Airbag-Recall-Delay-Petitions_David-DeVeau.pdf

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Link to Copy:

http://www.devco-design.com/design/dot/DOT-NHTSA-Airbag-Recall-Delay-Petitions_David-DeVeau.pdf

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