



CERTIFICATE OF TRUE COPY

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I HEREBY CERTIFY that the annexed is a true copy of a letter dated November 28, 1980,
from Joan Claybrook to General Motors Corporation, and the first page
of nearly identical letters to other automobile manufacturing companies,
concerning various improvements in the automobile industry.

on file in the Office of Crashworthiness Research, in my custody.

Signed and dated at Washington, D.C.

this 12 day of May, 19 94

by Louis Lombardo

Louis Lombardo
Physical Scientist

(Title)

I HEREBY CERTIFY that Louis Lombardo

who signed the foregoing certificate, is now, and was, at the time of signing, a Physical Scientist in the
Office of Crashworthiness Research

and official custodian of the subject record, and that full faith and credit should be given his/her certificate as such.

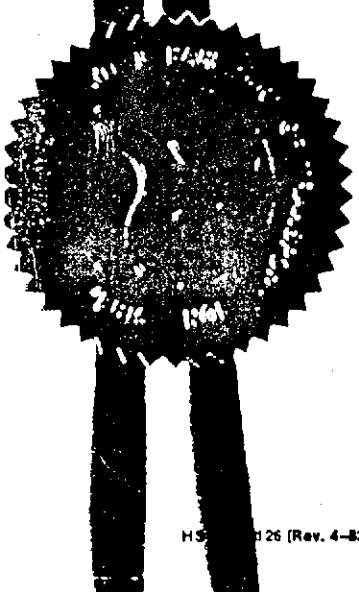
IN WITNESS WHEREOF, I have hereunto subscribed my name,
and caused the seal of the Department of Transportation to be
affixed this 16TH day of MAY
one thousand nine hundred and NINETY FOUR

For the SECRETARY OF TRANSPORTATION

Edmond R. Koch

Certifying Officer

NHTSA RECORDS OFFICER





U.S. DEPARTMENT OF TRANSPORTATION
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
WASHINGTON, D.C. 20590

THE ADMINISTRATOR

NOV 28 1966

E. M. Estes, President
General Motors Corporation
General Motors Building
Detroit, Michigan 48202

Dear Mr. Estes:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

As important as all of these constituents are, your most basic trust is to the people who use your automobiles and trucks. Not only do they depend on these vehicles for their transportation needs, but their very life and limb frequently depends on the quality of the safety performance you design into them.

From time to time, your company has taken special steps to enhance vehicle safety. For example, General Motors anticipated our motor vehicle safety standards in the late 1960's with improved side impact intrusion resistance; GM has taken a lead in building vehicles like the X-body with improved structural crashworthiness; and GM is still the only company that has built cars with air bags for sale to the general public.

It can be said without contradiction that the advances in safety built into cars in the past have not compromised your responsibilities to your workers, your stockholders, or your dealers. In fact, it makes simple, good business sense to satisfy the public's need and demand for safer vehicles. Indeed, over 60,000 Americans owe their lives to the safety advances made in the last 12 years under the aegis of our motor vehicle safety program.

With the introduction of large numbers of small cars on American highways, we can anticipate an increase of 10,000 to 15,000 lives lost per year by 1990. You should consider that in the years ahead



It's a law we
can live with.

the automakers' view that safety has no market value could prove to be just as wrong as their attitude of a year or two ago toward fuel efficiency. The long-held consumer preference for big cars in the United States was due, in some part, to the feeling that bigger, heavier cars are safer in a crash. Now, as cars must get lighter to achieve greater efficiency, safety looms larger in the purchase decision. And with good reason. In large car/small car crashes, 85 percent of the fatalities occur to the small car occupant. Perhaps that's why safety belt usage occurs in only nine percent of the large cars but in 18 percent of the small ones.

Motor vehicle crashes in the United States are already the largest killer of citizens under age 44. One baby in 40 born today will die in a motor vehicle crash, and one in twenty will be injured. Highway crashes are a significant cause of epilepsy and the major cause of paraplegia in this country. Approximately one-third of all occupational injuries result from motor vehicle crashes costing employers billions of dollars in lost productivity and talent. Approximately 140 Americans die on the highway each day, the equivalent of a major airline crash 365 days a year. Every ten minutes another person is killed, and every nine seconds another is injured -- every day of the year.

The question facing public health officials and motor vehicle manufacturers is: are there readily available remedies within the present state-of-the-art. As we both know, there are many. The experimental safety vehicles produced by this agency in the past several years supply just one example of the types of designs and materials which can save literally thousands of lives in this country each year. They are designed to protect occupants in frontal and side impact crashes up to about 50 miles per hour. You, of course, are aware of many other innovations which could similarly serve the public.

Our Federal safety standards are and were intended by Congress to be minimum standards. The tragedy is that many manufacturers have treated the standards more like ceilings on safety performance rather than floors from which to improve safety. For example, there are many safety standards which apply only to passenger cars, yet some manufacturers have not applied them to light trucks and vans without a Federal requirement to do so.

Recognizing the need and the many opportunities available to your company to ameliorate the current and anticipated trauma on our highways, there are a number of priority safety performance features which should and readily can be incorporated in your vehicles as you improve them and redesign them in the next few years -- important opportunity years. The key areas of vehicle design which can significantly increase the likelihood of surviving a crash without serious injury are:

1. Occupant restraints -- to prevent or soften the second collision of the occupant with the vehicle's interior.
2. Crash energy management -- to absorb, control, and reduce crash forces on the occupants with improved structural design.
3. Structural integrity -- to prevent occupants from being ejected, trapped, burned, or crushed by collapse of the occupant compartment.
4. Crash avoidance -- the ability of a vehicle to prevent crashes or reduce their severity, for example, through better handling, braking, visibility, signaling, and danger diagnostic systems.
5. Pedestrian protection -- the ability of a vehicle to prevent or reduce injuries to pedestrians in the inevitable collisions between vehicles and people.

If there is one most important lesson we have all learned, it is that building safety into the vehicle so that it is automatic or passive is far more effective than relying on hundreds of millions of people to individually take special safety actions repeatedly, countless times without fail. And we also know that it is cheaper by far to design in safety at the drawing board stage of production than to add on safety features afterwards.

The following list discusses these and other areas for obvious improvement, in many cases with minimal or even negligible cost.

In many instances the Department of Transportation is proceeding with the development of safety standards in these areas, but as you know, that is a laborious process which must consider the particular problems of the least capable manufacturers, and it does not supercede the responsibility of individual companies to enhance the safety quality of their vehicles:

I. Frontal Crashworthiness

A. Improved Occupant Crash Restraints

Each year frontal crashes kill nearly 20,000 people and injure hundreds of thousands more as occupants of passenger cars, light trucks and vans. With automatic crash protection, an occupant's risk of death and serious injury can be reduced by about 50 percent. The automatic crash protection standard is estimated to save nearly 250,000 lives and prevent more than a million serious injuries between now and the year 2000.

Air Bags - Not since 1976, when GM stopped selling cars equipped with air bags, has the American public been given a chance to purchase -- at any price -- a new car built with air bag automatic crash protection. This choice of an unobtrusive and potentially superior crash protection system has been denied the American public for far too long at great expense in lives and injuries.

Front Safety Belts - The 35 mph frontal barrier tests we have conducted under the New Car Assessment Program indicate that many existing restraint systems are not performing adequately at speeds above 30 mph. In many cases, the belts allowed excessive excursion of the occupant torso, resulting in violent head strikes. These problem belts should be corrected immediately.

Cars such as the Citation, Omni/Horizon, Mustang/Capri, and Fiat Strada have demonstrated that an added margin of safety, over the 30 miles per hour protection called for in the standard, can readily be built into current vehicles.

Rear Safety Belts - In many cars, the accessibility of the rear seat belts remain a serious problem which discourages use. Those occupants sufficiently motivated to dig for the rear belts may be rewarded with cut hands from sharp objects, or as a minimum, with dirty hands. Accessibility of rear belts needs improvement. Moreover, rear seat three-point belts should be offered for additional protection to rear seat occupants. They have been offered by Volvo, Mercedes, and a few others for many years as standard equipment.

Comfort and Convenience of Safety Belts - Inadequate attention is paid to the comfort and convenience of seat belts. Agency studies on the comfort and convenience of safety belts show that many current safety belts tend to discourage rather than encourage usage. The manufacturers can and should build easier to use and more comfortable belt systems using the numerous techniques available to automotive designers.

Child Safety - More attention must be given to accomodating child restraints. Belts should be suitable for attaching child restraints, and anchors for top tethers should be provided to encourage their use. GM is at least now predrilling holes for tether attachments in some of their cars, but built in anchors would greatly facilitate usage.

B. Safer Vehicle Interiors

Steering Wheel, Column and Hub - Current regulations have minimum requirements for steering column movement to provide for controlled collapse to cushion the driver in a crash. However, our crash testing and accident data analysis indicate that many steering wheels and columns have undesirable characteristics which are not addressed by the safety standards. These include inadequate collapse when subjected to offset loading, inadequate collapse of tilt wheel columns in commonly used positions, excessive

vertical displacement of steering columns, and aggressive or inadequately padded steering wheels and hubs.

In several of our new car assessment tests, the steering column displaced rearward or upward and caused severe loading to the dummy head and chest. This was particularly the case with some of the vehicles with transverse, front wheel drive engines. Steering column performance depends to a large extent on a column design which does not allow the column to be loaded by components in the engine compartment.

Possible design solutions to steering column problems include adding a collapsible section, improving the energy absorbing characteristics of the column, designing the column assembly to prevent loading by vehicle components under the hood, and providing an energy absorbing column that will absorb energy in bending and shear as well as in the axial direction. Based on engineering assessments, the costs of any of these modifications should not exceed \$15 per vehicle even if they were made as running changes without waiting for major vehicle design. Many companies whose current designs just meet the minimum Federal requirements have prepared improved designs which could reduce the potential for injuries to the head and chest. These improved designs should be incorporated into cars without delay.

Interior Protection for Children - Although over 90 percent of our children under age 5 travel unrestrained, and cars are not equipped with restraint systems for these children, minimal attention is paid by manufacturers to the safety of unrestrained children. Padding is not provided on the lower dashboard in most cars. Heater controls, gear shift levers, radio knobs, etc., are not designed with the protection of children in mind. On the presumption that most occupants would be belted, the original safety standards did not address padding or interior protrusions on the lower dashboard. Recent studies by GM have heightened our awareness of how easily out-of-position occupants,

particularly children, could be injured by hard points and protrusions on the lower dashboard. More smooth and padded surfaces in vehicle interior designs and elimination of injury causing protrusions will reduce injuries, particularly to children, as the Insurance Institute for Highway Safety has documented.

Laminated Windshields - The French have been pioneering the use of a layer of plastic on the inside surface of windshields to reduce laceration-injuries in crashes. This would require an amendment to the Federal glazing safety standard, and the agency would appreciate your comments on the potential of such a change to reduce injuries.

C. Safer Vehicle Structure

Crashworthy Structure - Considerable improvement has been made in the frontal crashworthiness in some U.S. vehicles during the past 5 years. However, because smaller vehicles are rapidly increasing and are involved in more severe collisions, increased crashworthiness is needed in order to maintain the level of safety which currently exists in the average size U.S. car. Manufacturers have demonstrated the capability in their more recently designed vehicles to reach toward this goal and should meet the challenge of small car safety through further improvements in structure for these cars as the Department of Transportation (DOT) has done with its Research Safety Vehicles (RSV).

II. Side Impact Protection

Each year, side impact crashes kill nearly 10,000 people and injure about 100,000 people. Yet little attention has been paid by vehicle designers to side crash protection. There have been practically no improvements in side impact occupant protection since the door beam was introduced in 1969. NHTSA is developing test devices to assist manufacturers in improving the safety of vehicles in side impact, but manufacturers should develop improved side impact resistance and incorporate improvements in production without waiting for a new Federal standard.

Some examples of the improvements that can readily be made are:

- (a) strengthened doors, door frames, door hinges and latches to prevent intrusion into the occupant compartment;
- (b) improved padding on the doors and door frames to cushion impacts;
- (c) design of glazing retention to soften the impact of the occupant's head and to prevent ejection of the occupant;
- (d) improved seat structure design to cushion side impact forces.

III. Rear and Rollover Crash Protection

Each year rollover and rear end crashes kill nearly 6,000 occupants of passenger cars, light trucks, and vans and injure many thousands more people.

Fuel System Integrity - Fuel tank design and location are well below the state-of-the-art knowledge. We were disappointed to observe how many large cars failed the fuel system integrity test in our 35 mph crash test program. Most of the smaller cars passed this test. The improvements which have been incorporated in some small cars, such as the Citation, Omni/Horizon, and Mustang/Capri, can and should be applied to large cars without delay.

Occupant Compartment Integrity - The tragic loss of life in fiery crashes could also be reduced by improved design of a fire resistant barrier behind the rear seat. Such a barrier should separate the occupants from gasoline vapors in a rear end crash. As vehicles are currently designed, these vapors too often ignite and travel directly into the occupant compartment in a rear end crash.

Rollover Crash Protection - Vehicles have not been adequately designed to minimize ejection, which is currently not regulated but is a major contributor to death and injury. Nearly 20 percent of crash fatalities occur in rollover crashes, where the risk of ejection and injury is nearly ten times greater than in non-rollover crashes. Structural integrity design features to strengthen the roof and improved glazing and door latching can improve occupant safety in rollover crashes and are well within the current state-of-the-art.

Head Restraints - Many adjustable head restraints are of reduced value in service because in normal use they are left in their lowest position. In this position, most are too low to provide much protection for many occupants. Head restraints should be designed to protect a major segment of the population without adjustment. This can be done without overly restricting rearward visibility as demonstrated on Volvos, Saabs, and Chevettes. In addition, the rear of the head restraint should be designed to reduce injury to rear seat occupants who might strike the head restraint during a frontal collision.

Improved Seat Track and Seat Back Design - The crash tests of our New Car Assessment Program have revealed a number of seat track and seat back failures. The automakers should review their designs to insure that seats do not fail catastrophically in crashes, and that in frontal crashes the backs of front seats should be strong enough and well padded to provide protection for unrestrained rear seat passengers. This is particularly important for the protection of children.

IV. Crash Avoidance

1. Brake Lining Wear Indicators

Brake lining wear indicators are already used on some vehicles and should be applied more widely. Obviously, the presence of an indicator is a desirable safety and consumer cost savings feature.

2. Low Tire Pressure Indicator and "Run-Flat" Tires

Like brake lining wear indicators, low tire pressure indicators would provide safety and fuel economy benefits to the consumer.

Low tire pressure indicators could save hundreds of lives and several million barrels of oil each year if introduced as original equipment on all new cars and trucks. The technology exists for units replaced at the valve stem and immediate implementation is possible.

Run-flat tires provide safety and convenience on passenger cars. Some European models already use a run-flat tire as standard equipment. American tire manufacturers should be encouraged to develop their own versions of run-flat tires. The auto industry in turn should incorporate run-flat tires into future vehicle development plans as soon as possible.

3. Tire Reserve Load

Many vehicles, especially light trucks and vans, currently have tire reserve loads which are marginal; tire reserve loads on these vehicles should be increased to provide adequate protection. This is especially important as motorists accustomed to large cars shift to small cars and overload them more often.

4. Silicone Brake Fluid

Silicone brake fluid would provide consumer maintenance and safety benefits by improving durability and reducing corrosion in brake systems.

5. Visibility

A common complaint among consumers is poor visibility, particularly in the rear quarter directions. Visibility has always been a secondary consideration to styling.

Excessively large "C" pillars and louvered rear windows used to add "zing" to the look of some vehicles, such as Trans Ams, seriously cut down rear visibility. Motor vehicle stylists can easily remedy this type of safety deficiency.

6. High Mounted Brake Lights

Several scientific studies show that rear end crashes can be substantially reduced through the use of a centered, single high mounted rear stop light signal. Today, cars are not being built with such stop lights, but they are easy and relatively inexpensive to install in newly designed vehicles.

V. Pedestrian Safety

With some 8,000 people being killed and many more injured each year as pedestrians are struck by motor vehicles, there is an urgent need for manufacturers to design the front ends of vehicles to reduce and minimize injuries. Our research programs have shown that soft front bumpers, hood and fender edges can reduce injuries and the likelihood of death in these crashes. With this advancement in our knowledge and the state-of-the-art, it is disheartening to see companies still spending money to install stylistic hood ornaments that inevitably inflict injuries. Although many companies removed them in the late 1960's, most companies have re-introduced the hood ornament which, although now spring loaded, can exacerbate injuries to pedestrians, particularly small children whose faces are at the level of the ornament. This practice should be stopped and the trend to soft front bumpers accelerated.

For several years during the mid-1970's, the major car sellers prepared and submitted to the National Highway Traffic Safety Administration a corporate vehicle safety progress report. This should be reinstated. It could catalog new and innovative safety performance and features that you have put into your products. It should show the public that you dedicate a portion of your company's resources to safety progress. If this effort is effectively advanced, you will see your investment more than returned.

I look forward to learning of the initiatives you might take in the near future to improve the safety of your customers when they travel in your cars.

Sincerely,

Joan Claybrook

NOV 28 1960

Philip Caldwell, President
Ford Motor Company
The American Road
Dearborn, Michigan 48121

Dear Mr. Caldwell:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

As important as all of these constituents are, your most basic trust is to the people who use your automobiles and trucks. Not only do they depend on these vehicles for their transportation needs, but their very life and limb frequently depends on the quality of the safety performance you design into them.

From time to time, your company has taken special steps to enhance vehicle safety. For example, Ford initiated the upgrading of vehicle safety back in 1956 with safety belts, padded instrument panels, recessed-hub steering wheels, and interlocking door latches. Ford was more recently a leader in substantially upgrading the safety of its vans even though it was not required by Federal standards.

It can be said without contradiction that the advances in safety built into cars in the past have not compromised your responsibilities to your workers, your stockholders, or your dealers. In fact, it makes simple, good business sense to satisfy the public's need and demand for safer vehicles. Indeed, over 60,000 Americans owe their lives to the safety advances made in the last 12 years under the aegis of our motor vehicle safety program.

With the introduction of large numbers of small cars on American highways, we can anticipate an increase of 10,000 to 15,000 lives lost per year by 1990. You should consider that in the years ahead

NOV 28 1981

James W. McLernon, President
Volkswagen of America, Inc.
27621 Parkview Blvd.
Warren, Michigan 48092

Dear Mr. McLernon:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

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From time to time, your company has taken special steps to enhance vehicle safety. For example, Volkswagen was a leader in introducing automatic belts on its Rabbit models and has constructed two advanced safety vehicles, the IRVW and the ESVW, that have advanced our thinking about the high levels of safety that can be built into cars providing excellent fuel economy.

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NOV 26 1977

W. Paul Tippett, Jr., President
American Motors Corporation
27777 Franklin Road
Southfield, Michigan 48034

Dear Mr. Tippett:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

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NOV 28 1961

Mr. R. Recchia, President
Fiat Motors of North America, Inc.
155 Chestnut Ridge Road
Montvale, New Jersey 07645

Dear Mr. Recchia:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

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NOV 28 1951

Mr. K. Yoshizawa, President
American Honda Motor Company, Inc.
100 West Alondra Blvd.
Gardena, California 90247

Dear Mr. Yoshizawa:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

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NOV 28 1981

Tervo Maeda, General Manager
Nissan Motor Company Limited
P.O. Box 1606
Englewood Cliffs, New Jersey 07632

Dear Mr. Maeda:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

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NOV 28 1990

Mr. I. Makino, President
Toyota Motor Sales--USA, Inc.
2055 West 190th Street
Torrance, California 90509

Dear Mr. Makino:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

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NOV 28 1951

Lee A. Iacocca
Chairman of the Board
Chrysler Corporation
P.O. Box 1919
Detroit, Michigan 48288

Dear Mr. Iacocca:

As chief executive of one of the world's major automobile manufacturing companies, you hold a number of important trusts. Many thousands of workers depend on your guidance of the company for their livelihood. Your stockholders expect your business judgments to result in a reasonable return on their investments. Dealers, who sell your products, depend on your giving them a saleable and serviceable product that will satisfy their customers.

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From time to time, your company has taken special steps to enhance vehicle safety. For example, Chrysler was a partner in the development of the Calspan/Chrysler Research Safety Vehicle, some features of which were incorporated into its production cars.

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