

the Trade Agreement Act of 1979. For a copy of the proposed rule see Appendix E.

The proposed rule was to apply to most trucks and trailers with GVWR's greater than 10,000 pounds, and a ground clearance at the rear greater than 55 cm (21.56 inches). NHTSA further proposed that the rear guard will be wide enough such that its outmost edges are within 3.95 inches (10 cm) of the outmost sides of the vehicle. The guard also had strength specifications measured at different points on the guard rail, in line with a "medium strength" categorization. For details see Appendix E, Section S6.5 and Figure 2. The total applied load of 45,000 pounds ensures that the guard is at least moderately strong.

Exemptions



The proposed rule exempted three type of vehicles:


(1) "Low chassis" vehicles, such as household moving trailers, or passenger car haulers, where the low van structure prevents an underride.

(2) "Wheel back" vehicles, where the position of the wheels at the outmost position of the van prevents an underride, as shown in the tests discussed above. In order to qualify the rear axle must be permanently fixed and the rearmost part of the tires be no more than 30 cm (11.8 inches) from the rear extremity of the vehicle.

(3) "Special purpose" vehicles. These are trucks or trailers having work equipment located at the rear of the vehicle, such as drilling rigs, salt spreaders, and utility vehicles. This exempts vehicle which by their nature could not comply with the rule without imposing a severe economic hardship.

Costs and Benefits

 In 1980, NHTSA estimated that if the proposed rule was implemented in 1977, it could have saved as many as 60 fatalities per year in the period 1977-1979, and an even greater number of serious injuries for passenger car and light trucks occupants. It added that in light of the trend for increasing numbers of vehicles and smaller cars, it was expected that the number of lives saved and injuries avoided would be even higher in future years. 

 NHTSA estimated that the proposed rule would have applied to 339,000 trucks and trailers a year (based on 1979 statistics), and that 85% of them carry the current (ICC) guard. The installing of the proposed guard was estimated, in 1980, to cost \$50 more than the current (ICC) guard. The Consumer Price Index (CPI), increased from 100 to 140 between 1980 and 1988. So, in