

*Still doing this today!*

Finally, it turned the discussion around by stating that underride avoidance should be looking at other measures. In particular it called for improving and modifying auto front ends to increase their energy absorbing capacity "...and protect them when they strike bridges, trees, other cars, and other objects, as well as trucks."

Similar arguments were given by other opponents. In addition, automobile manufacturers called for an increase in the minimum weight requirement for trucks which will be required to install the proposed guard. The Ford Motor Company recommended a minimum GVWR of 12,000 pounds (versus the 10,000 pounds recommended by NHTSA), claiming that the benefits were conjectural because they were based on analysis and not test. The General Motors Corporation recommended even a higher limit, asking that the GVWR minimum will be set at 15,000 pound, because of commonalty with vehicles of less than 10,000 pounds.

#### Conclusion

As indicated throughout our analysis, the proposed NHTSA rule was never implemented. The exact reasons for not adopting it were never explicitly stated. However, one can infer that the strong opposition by the entire trucking industry combined with "deregulation" sentiments of the recent administration were the major factors in its failure to be implemented. We note that failure to implement a rule on underride guards took place despite extensive research indicating their expected effectiveness.

Based on the national experience, one might expect opposition by industrial groups in the State of Michigan. However, the sample of Michigan-based trucking companies which were interviewed in conjunction with this study indicated a positive attitude toward a Michigan rule for a minimum 22" guard for truck and trailers, but only if the rule is applied to newly-purchased vehicles, and not to refurbishing of existing ones.