

2008 SAE Government/Industry Meeting

NHTSA Outreach for Regulated Imported Safety Equipment



Jeffrey Giuseppe

Chief, Equipment Division

Office of Vehicle Safety Compliance

National Highway Traffic Safety Administration

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NHTSA's Mission



- Save lives, prevent injuries and reduce economic costs due to road traffic crashes, through education, research, safety standards and enforcement activity

Office of Vehicle Safety Compliance



- Equipment Division
- Vehicle Crash Avoidance Division
- Vehicle Crashworthiness Division
- Imports and Certification Division
- CAFE Enforcement / Vehicle Inspection Team

OVSC...continued



The primary function of the OVSC is to assure that manufacturers' certifications to the requirements of each of the FMVSS are valid and that they meet applicable CAFE regulations

This is accomplished by conducting random testing, vehicle/equipment inspections, requesting and reviewing certification data, and conducting investigations into possible noncompliances

Background



- Increased volume of motor vehicles and equipment imported from foreign countries
- NHTSA is expanding its communication with these foreign governments and industries through OVSC outreach
- Also increasing our outreach to domestic manufacturers and importers of record

Problem



- Foreign vehicle and equipment manufacturers do not fully understand the self-certification process, recall responsibilities, and defect investigation process
- Several compliance and defect investigations and recalls in recent years have involved imported equipment: wheels, tires, head lamps, motorcycle helmets, fuses, glazing materials, wheels, etc

Goal



- To reduce future safety problems in noncompliances and defects by communicating and educating foreign/domestic vehicle and equipment manufacturers and importers of record on NHTSA regulations, safety standards, reporting requirements, and process

Enforcement Program



- Increased enforcement of Safety Equipment FMVSS in these areas (Automotive lighting, tires, and motorcycle helmets)
 - Direct Enforcement / Inspections
 - Increased Compliance Testing
 - Viable Outreach Program with industry and foreign governments
- Increased surveillance of EWR, vehicle compliant, and field data to better detect defective equipment

Direct Enforcement



- For past several years we have had an evolving focused enforcement program targeting lighting, tires, & motorcycle helmets
- Increased number of compliance and defects investigations
- Increased use of Customs' (Customs & Border Protection) database
- Increased Compliance inspections
- Increased recalls – both compliance and defects

Increased Testing



- Initiated a compliance test program for lighting
- Increased number of tires being tested
- Increased the percentage of imported tires being tested

Outreach Program



- Developed educational materials
- Attended trade shows and conduct compliance inspections
- Partnered with industry
- Hired additional staff
- Developed Best Practices Federal Register Notice to inform industry of expectations

Educational Materials



- Guide for New Entrant Manufacturers
 - Targeting Importers and new overseas manufacturers
 - Explain certification responsibilities
 - Explain registration (P566, P551) necessary
 - Explain compliance testing process
 - Explain safety defect process
 - Explain where to obtain information
 - Organization chart
 - FMVSS applicability chart / CAFE requirements

Trade Shows



- Attended following trade shows
 - Automotive Aftermarket Parts Expo (AAPEX)
 - Dealer Expo Indianapolis
 - Mid America Trucking Expo
 - Chinese International Tire Expo

Partnering with Industry



- Motor Vehicle Equipment Manufacturers Assoc. (MEMA)
- Rubber Manufacturers Association (RMA)
- Motorcycle Industry Council (MIC)

Partnering...Continued



- Worked with MEMA to include language in their exhibitors contract prohibiting display of noncompliant product. If an exhibitor is found to be displaying such, management could remove item or prohibit exhibitor from the show the next year
- MEMA helped distribute literature explaining why HID conversion kits are illegal

Partnering...Continued



- Working with RMA to help identify suspect tires
- They have provided us with market data that will help us better focus our enforcement efforts
- Working with them in our outreach efforts to China

Partnering...Continued



- Working with the Motorcycle Industry Council
- MIC – Motorcycle trade group made up of motorcycle and motorcycle parts manufacturers
- Open dialog on compliance issues
- They support our efforts to educate consumers on dangers of novelty helmets
- Working to support their education efforts targeting m/c helmet buyers
- Provided a FAQ section on our website concerning motorcycle issues
<http://www.nhtsa.dot.gov/cars/rules/import/FAQ%20Site/pages/page3.html#Q9>

Hired Additional Staff



- In 2005 we hired two engineers (lighting)
- In 2007 we hired another engineer (tires)
 - Fluent in Mandarin

Hired Engineer Fluent in Mandarin



- He has been instrumental in helping to bridge the language gap with the emerging Chinese market
- Attended tire expositions in China (2007) – was invaluable at explaining technical nuances that would have otherwise been lost
- Will meet with Chinese Government and vehicle and equipment manufacturers in 2008 to conduct additional outreach

Future Actions



- Continue our outreach efforts - Industry trade organizations have been supportive
- Work more closely with trade organizations to identify exactly where noncompliant product are originating
- Hope to better utilize CBP data and personnel to stop noncompliant product from coming into the U.S.



QUESTIONS?