

Memorandum

SUBJECT: Management of Engineering Analyses and Petitions DATE: MAY 15 1978

In reply refer to:
NEF-13wo

FROM : Acting Chief
Engineering Analysis Division

TO : All Engineers
Engineering Analysis Division

Our role and responsibility in conducting engineering analyses is an important part of this agency's defect investigation program. This function has become more important with the increased emphasis that has been placed in the defects area, and the corresponding increase in consumer complaints that are being received. Therefore, I want to reiterate the general guidelines that we use in conducting engineering and petition analyses. Most of you are familiar with the procedures. However, I believe that by summarizing them here, we can lend more uniformity to both the conduct and presentation of our analyses.

In following these procedures, I want each of you to recognize that you have primary responsibility for the conduct of an analysis that has been assigned to you and for maintaining a complete file at all times. It is your responsibility to see that the analysis is conducted in a timely manner, and that all of the issues pertinent to either the closing of an analysis or recommending the initiation of a defect investigation are brought out. Keep in mind that our primary function is to identify the defect. The Defects Evaluation Division then determines the extent to which this defect is safety related. Obviously, we cannot ignore the safety implications in deciding the disposition of an analysis.

The procedures and guidelines listed below are what I consider to be basic requirements of every analysis. At the same time, I strongly encourage you to be innovative in your approach by omitting procedures that are not applicable and introducing new steps and procedures where appropriate, after discussion with appropriate supervision. Generally, the time span for conducting an analysis should not exceed 120 days. In the case of petitions there are no exceptions. In other cases it may be necessary to extend this time period where certain test programs are involved. However, 120 days should generally be the rule. In every analysis consider the following steps:

1. Contact the complainant involved where applicable (i.e., the basis for the analysis) to obtain additional information and to better identify the scope and nature of the problem. Additionally, in the case of petitions, send a letter of acknowledgment (see Attachment A) to the petitioner within two weeks of receipt of the petition (include a copy of petition with yellow).

2. Send an information request to the manufacturer involved. This should be done within one to two weeks of the opening date of an analysis.



BUY U.S. SAVINGS BONDS REGULARLY ON THE PAYROLL SAVINGS PLAN

Attachment B should be used as a guide in the event of a request. Include copies of ODI complaints or a copy of the complaint (if applicable), and mention applicable service bulletins where appropriate that the manufacturer can better understand our basis for concern.

3. Search the following NHTSA and ODI records for information pertinent to the analysis:

- a. The ODI consumer complaint file for other similar complaints. Consider a search for similar complaints among peer group vehicles for comparison purposes.
- b. The Parts Return Program for similar reports. Consider the use of the PRP News for specific requests of PRP participants.
- c. The ODI manufacturers service bulletin file for any bulletins identifying a related dealer fix.
- d. The ODI engineering and petition analysis files for related analyses that have been conducted in the past. (These files are in the process of being computerized.)
- e. The ODI recall campaign files for related or precedent-setting recalls conducted by the manufacturer involved or other manufacturers.
- f. The ODI investigative case files for similar investigations involving the subject manufacturer or other manufacturers. Discuss with the ODI investigator involved.
- g. Request related accident reports from the NHTSA, National Center for Statistics and Analysis. Consider a request to the NHTSA, Technical Services Division (Library) for a search for pertinent NHTSA literature and research data. Attachment C can be used to request this information.
- h. Review Federal motor vehicle safety performance standards for any that may be related to the problem under analysis. Contact the cognizant engineer in the Office of Vehicle Safety Compliance where appropriate.

4. Consider testing that would identify the defect, as well as the possible safety consequences involved. Quick reaction testing resources include our Engineering Test Facility in Ohio as well as several contractors with whom we have basis ordering agreements.

5. After 90 days, prepare a short and concise briefing of the information obtained above for the Office Director. If the defect warrants further consideration it will be presented to the Defects Review Panel. Attachment D should be used as a guide. In the case of petitions, the final package should reach the Director, ODI, thirty days prior to the 120 day deadline. This is necessary to allow time for legal review and the Administrator's signature when required. Petitions are briefed only if there is a question concerning acceptance or denial.

Although surveys are rarely a part of an engineering analysis, if you ~~contact~~
one, make sure that an approved OMB number is used when contacting ten or more
individuals or manufacturers. This number must appear on each letter.

W H Risteen

William H. Risteen

8 Attachments