September 5, 2008

Mr. David Kelly
Acting Administrator
National Highway Traffic Safety Administration (NHTSA)
1200 New Jersey Ave., SE
Department of Transportation, West Building
Washington, DC 20590

Comments on Federal Motor Vehicle Safety Standards; Windshield Zone Intrusion, 73 FR 38372, July 7, 2008, Docket No. NHTSA-2008-0124

Dear Mr. Kelly:

Public Citizen and the Center for Auto Safety respectfully submit the following comments on the National Highway Traffic Safety Administration's (NHTSA) proposal to rescind Federal Motor Vehicle Safety Standard (FMVSS) No. 219, regarding windshield zone intrusion. We acknowledge the importance of periodic review of federal regulations. However, we are concerned that NHTSA has not provided supporting data or analysis to justify its assertion that compliance with FMVSS 219 is redundant with FMVSS 208 and 113.

We will identify three concerns about NHTSA's logic in recommending rescission:

- FMVSS 208 measures head and chest injury in a frontal impact crash, and is not designed to measure the windshield zone intrusion.
- FMVSS 113 only requires that vehicles have an effective hood latch system, it is not a crash test and it does not measure injury potential.
- FMVSS 219 is meant to ensure that occupants are not injured by intruding vehicle components, especially the vehicle's hood, but it is not limited to the scope of frontal impact crashes of the type tested in FMVSS 208.

Before the agency rescinds a regulation, it must complete an analysis of the effectiveness of the rule, the history of that regulation, and the potential consequences of rescinding that regulation. NHTSA has taken none of these steps in its notice. The public cannot effectively comment on the potential consequences of rescinding FMVSS 219, because the agency has provided insufficient information about its review of the regulation. At a minimum, NHTSA must present an analysis showing how FMVSS 208 testing covers the requirements of FMVSS 219, and provide the public with a basis for review of the agency's decision.

NHTSA states that compliance with FMVSS 219 has not been an issue since shortly after its inception.[1] However, since companies complied with the standard, which corrected the intrusion problem this is to be expected. The mere fact that there are complaints about the effectiveness of the standard alone does not support its rescission. Unlike many other safety standards required by NHTSA, the effectiveness of FMVSS 219 does not depend on a piece of equipment like a seat belt or air bag, but instead provides a guideline for how the vehicle structure will perform in a crash. Vehicle performance encompasses the requirements of the full spectrum of FMVSS standards. Therefore, NHTSA must show that rescinding one of these requirements would not have unintended consequences.

We challenge NHTSA's claim that FMVSS 219 is redundant, particularly in the absence of any data or analysis to support this notice. NHTSA states: "We tentatively conclude that the FMVSS No. 208 frontal crash tests will reflect any blunt impact injuries due to zone intrusion at the windshield." The agency based on speculation is making a recommendation to rescind a safety standard that places a minimal burden on the industry. The effectiveness of FMVSS 208 at achieving the same level of protection as FMVSS 219 is untested. NHTSA has not provided any concrete data or observations about windshield zone intrusion in the FMVSS 208 testing program, or real-world crash observations. The purpose of FMVSS 219 is to require manufacturers to design vehicles in such a way that the windshield zone is not compromised, whereas the purpose of FMVSS 208 is to promote occupant protection in frontal-impact crashes. Even if FMVSS 208 testing could potentially expose windshield zone intrusion, it does not necessarily provide the same occupant protection as FMVSS 219.

The windshield zone intrusion standard protects occupants from vehicle components that may enter the protected zone in crashes that do not resemble the FMVSS 208 frontal crash test. An offset frontal crash may result in hood deformation and unlatching that is not predicted by the FMVSS 208 test, but may still injure occupants in such crashes. The Insurance Institute for Highway Safety (IIHS) reviewed cases in the National Accident Sampling System Crashworthiness Data System (NASS CDS) for intrusion into the protected windshield zone, and discovered that "[w]indshield intrusion occurred in a small number of offset crashes, pole impacts, and severe underride collisions with large trucks or tractor trailers."[2] Windshield zone intrusion in these cases would not be redundant with intrusion observed in FMVSS 208 testing. This argues for retaining FMVSS 219 and adding an offset frontal crash test.

NHTSA further states that FMVSS 219 is unnecessary because FMVSS 113 requires that vehicle hoods have a latch system and that the latch system has a second position to prevent inadvertent opening of the hood, "limiting displacement into the windshield area of motor vehicle components during a crash."[3] As with the relationship between FMVSS 208, the purpose of the hood latch requirement is not primarily to prevent windshield zone intrusion, and so design choices made by manufacturers about how the vehicle hood is designed that prevent windshield zone intrusion may still be relevant, even in the presence of a latch system that is meant to keep the hood from opening. The simple presence of the hood latch standard, which

[1] 73 FR 38372, 38375. (Jul. 7, 2008) at 38373.
[2] *See* Comments of Insurance Institute for Highway Safety to NHTSA Docket No. NHTSA-2008-0124 at 2 (Aug. 29, 2008).
[3] 73 FR 38373.

may or may not protect against windshield zone intrusion does not imply directly that FMVSS 219 is no longer necessary. In a crash, the hood may remain latched, but still be pushed back into the windshield.

The Center for Auto Safety has compiled a list of 40 recalls from model years 1980 through 2007 affecting 5,858,852 vehicles related to defective hood latch equipment. The presence of FMVSS 113 does not protect occupants in the face of these defects; therefore, the protection provided by FMVSS 219 ensures that occupants are not injured by an intruding roof in the event of a latch failure. NHTSA has provided no analysis of the potential risk to occupants as a result of rescinding FMVSS 219, or how FMVSS 208 and 113 protect occupants against intrusion of vehicle components into the protected zone.

Before NHTSA rescinds any standard, it must assure the public that its rescission will not result in a degradation of safety; however, the agency has made no attempt to provided the public with enough information to know whether FMVSS 219 is redundant. It has not made use of its own resources to make an estimate of the benefit of rescinding FMVSS 219 or the potential cost as a result of increased injuries due to intrusion of motor vehicle components into the protected windshield zone. NHTSA keeps records of motor vehicle crashes through NASS CDS. The agency should provide an analysis of NASS CDS cases to establish whether there is sufficient protection to occupants from windshield zone intrusion.

In coming years, there will be an influx of new small cars from Europe and Asia, which will not necessarily be designed with consideration of FMVSS 219 if it is rescinded. NHTSA noted that compliance with FMVSS 219 hasn't been a problem since shortly after the establishment of the standard.[4] The purpose of the standard is to prevent a problem by assuring a minimum standard of safety. Vehicles built for sale in the United States must comply with all of the motor vehicle safety standards administered by NHTSA, and the protection that occurs as a result of vehicle design that is created for compliance with the standards does not apply in the same way to vehicles that are designed and developed abroad. The advantage of having a standard is to ensure a minimum level of safety is maintained.

We are concerned that NHTSA has not completed a through review of FMVSS 219 before publishing a notice suggesting it be rescinded. We assert that widespread compliance with motor vehicle safety standards does not argue for their recission. Motor vehicle safety standards are meant to assure a minimum level of safety. For a vehicle to be legally sold in the United States, it must comply with each of these safety standards, and the industry uses these standards as mandates in designing vehicles.

Entrusting the industry to meet these minimum guidelines voluntarily is exactly contrary to the mission of NHTSA. Congress rejected voluntary action by the industry three decades ago when it passed the National Traffic and Motor Vehicle Safety Act in 1966. The Senate Committee Report stated: "The promotion of motor vehicle safety through voluntary standards has largely failed. The unconditional imposition of mandatory standards at the earliest practicable date is the only course commensurate with the highway death and injury toll."[5]

[4] 73 FR 38373.
[5] Committee Report on S. 3005, The Traffic Safety Act of 1966, June 23, 1966, at 271, 273, 274.

NHTSA is entrusted to ensure that mandatory minimum standards exist to protect people on the highways.

Since NHTSA has not provided sufficient information for the public to make a determination about the potential consequences of rescinding FMVSS 219, Public Citizen and the Center for Auto Safety support its retention. The widespread compliance by industry with this standard cannot be ensured if it is rescinded, and the burden to industry and NHTSA in maintaining the standard is minimal. NHTSA should be responsible about the regulatory review process, and provide data and analysis to support its claim that the standard is redundant and the same level of occupant protection is afforded by FMVSS 208 and 113.

HOOD RECALLS ARRANGED BY MANUFACTURER (1980 through 2007)

NHTSA Identification #	Date of Company Notification	Make	Model	Model Year	Number of Vehicles
		CHRYSLER			
80V-138	10-13-80	Dodge Plymouth	Omni Horizon	1980	235,000

Mfg. Campaign No. 283. Hood secondary catch. DOM—8/79-6/80. Hood secondary catch may be subject to binding due to variations in catch and its mounting base assembly. Inadequate catch to mounting base pivot surface clearance may cause catch to bind in open position, resulting in inoperative secondary catch system. (Correct by inspecting and repairing.)

84V-008	1-19-84	Chrysler Dodge	Laser Daytona	1984	2,500

Mfg. Campaign No. 352—Hood Latch/Panel. DOM—7/83-12/83. Cars may have inadequate structural integrity of hood latch system attachment to hood panel. This could result in separation of hood panel from latch system mechanism. (Correct by inspecting and replacing hood panels exhibiting improper attachment.)

92V-070	5-5-92	Chrysler	LeBaron	1992	17,000

Mfg. Campaign No. 548. DOM- 8/91-2/92. Hood latch assembly may not have been properly installed & secondary hood latch may be prevented from engaging when hood is closed. If primary hood latch engagement fails, lack of engagement by secondary hood latch could cause hood to open while vehicle is in motion, reducing operator's ability to see road & oncoming traffic, & result in vehicle accident. (Correct by adjusting secondary hood latch to allow latch assembly to properly engage when hood is closed.)

95V-056	3-20-95	Dodge	Ram	1994-95	175,000

DOM - 1/94-12/94. Secondary hood latch rod can bind on guide bracket & prevent engagement of secondary latch. This can cause hood to fly up & obstruct driver's vision, resulting in accident. (Correct by replacing secondary hood latch bracket.)

97V-095	8-7-97	Plymouth Dodge Chrysler	Breeze Stratus Cirrus	1996-97	219,000

Mfg. Campaign No. 734--Hood. DOM - 03/96-04/97. Secondary hood latch spring can disengage from retention hole if hood is slammed shut. If primary latch does not engage, hood would not be restrained & vehicle could crash. (Correct by replacing secondary hood latch spring with longer end hook spring.)

01V-040	2-7-01	Dodge	Ram	1994-99	681,740

Mfg. Campaign No. 973. DOM: 7/93-3/99. Corrosion of return spring on hood secondary latch could cause mechanism to bind in "release position." If primary latch is not engaged, hood could open unexpectedly. Correct by replacing secondary hood latch in salt belt states (Maine, New Hampshire, Vermont, Massachusetts, Rhode Island, Connecticut, New York, New Jersey, Pennsylvania, Delaware, Maryland, District of Columbia, West Virginia, Ohio, Indiana, Michigan, Illinois, Wisconsin, Minnesota, Iowa, & Missouri).

06V-431	11-08-06	Chrysler	Sebring	2007	2,258

Mfg. Campaign No. F45 - Hood. DOM: 8/06-10/06. Hood latch striker may break and allow hood to open while driving resulting in crash without prior warning. (Correct by replacing hood latch strikers.)

		FORD			
84V-111	9-20-84	Ford	Ranger	1983-84	460,918

DOM—1/82-7/84. Front end was assembled with radiator support in out of tolerance position. Secondary hood catch may not retain hood if primary latch were inadvertently released or failed to catch. Hood could fly up and block driver's view while truck is in motion. (Correct by inspecting and adjusting hood secondary catch as necessary.)

91V-147	9-4-91	Lincoln	Town Car	1991	72,000

Mfg. Campaign No. 91S40. DOM- 8/90-4/91. Secondary hood latch may not engage when hood is closed. In event primary hood latch releases when vehicle is in motion, hood could fly up, obstruct driver's vision, & cause vehicle accident. (Correct by installing new hood latch assembly.)

NHTSA Identification #	Date of Company Notification	Make	Model	Model Year	Number of Vehicles
95V-091	5-10-95	Lincoln	Town Car	1990-91	142,800

DOM - 7/89-3/91. Corrosion of hood latch striker plate causes detachment of plate from hood assembly resulting in unexpected opening of hood while vehicle is driven. If this occurs, driver's view of road will be reduced & could result in vehicle accident. (Correct by installing new hood inner panel reinforcement & new, galvanized hood latch striker plate.)

95V-151	8-07-95	Lincoln	Town Car	1991-92	73,837

DOM - 04/91-10/91. Secondary hood latch may not engage when hood is closed. If primary hood latch releases or is not properly latched when vehicle is in motion, hood could fly up & obstruct operator's vision, resulting in accident. (Correct by replacing hood latch assembly.)

97V-024	1-29-97	Ford	Crown Victoria	1992-97	125,000

Mfg. Campaign No. 97S63. DOM - 03/91-10/96. Hood latch striker can wear or become detached from hood. Either condition can result in hood opening without warning while car is in motion impairing driver's visibility. (Correct by installing improved hood latch striker on 1992 model hoods, or revised striker plate attaching fasteners on 1993-97 model hoods.)

97V-180	10-17-97	Ford	Windstar	1995-96	769,000
			Mustang	1994-96	

Mfg. Campaign No. 97S88. DOM - 01/94-12/95. Tearing of bond between inner & outer hood panels during minor front end collisions can result in gap at leading edge of hood. Air forced between inner & outer panels can produce enough pressure to force outer panel upward, resulting in total separation of outer hood panel. (Correct by inspecting hood area for any damage along leading edge of hood. If there is any evidence of bond separation, hood will be replaced. If there is no evidence of bond separation, additional adhesive will be applied between inner & outer hood panels.)

99V-164	6-24-99	Ford	Explorer	1998-99	845,000
		Mercury	Mountaineer		

Mfg. Campaign No. 99S18. DOM: 4/97- 5/99. Secondary hood latch can corrode at latch pivot & stick in open position. When primary hood latch is released or not engaged, hood fly-up could occur. (Correct by installing secondary hood latch with components that are coated prior to assembly to protect against corrosion.)

00V-394	11-16-00	Ford	Explorer Sport	2000-01	137,813
			Explorer Sport Trac		
			Ranger Edge 4x2	2001	
			Ranger Edge 4x4		
			Ranger XLT 4x4		

Mfg. Campaign No. 00S45. DOM: 9/99-10/00. On SUVs with steel hoods & pickups with sheet molding compound hoods, wire-formed hood strikers are susceptible to fatigue fractures. If hood striker fractures, hood can fly open while driving & result in crash. (Correct by replacing hood striker.)

GENERAL MOTORS

83V-049	4-28-83	Chevrolet	Z-28 Camaro	1983	4,393

DOM—1/4/83-1/26/83. Cars with fiberglass hoods are subject to hood inner and outer panel separation. If separation occurs while car is in motion, hood outer panel could fold back and block driver's view. This could result in vehicle crash without prior warning. (Correct by inspecting and, if required, installing new hood.)

86V-121	8-26-86	Oldsmobile	Calais	1985-86	206,651

DOM—7/84-4/86. Secondary hood latch may be incorrectly aligned or exhibit binding of latch pivot which could result in primary hood latch not being completely engaged. Hood could unexpectedly open while vehicle is in motion, reducing forward vision of driver and cause crash. (Correct by replacing secondary hood latch and inspecting primary hood latch pop-up lever.)

86V-165	12-11-86	Chevrolet	Corsica	1987	4,884
			Beretta		

DOM- 8/86-11/86. Secondary hood latch may not properly engage due to contact with support bracket and or primary latch return spring. Hood could open and contact windshield, reducing driver's vision, & causing crash. (Correct by installing secondary latch skid plate on Corsica and Beretta. Install revised secondary latch on Beretta.)

NHTSA Identification #	Date of Company Notification	Make	Model	Model Year	Number of Vehicles
87V- 062	5-1-87	Chevrolet	Corsica	1987	2,020

DOM- 11/86-12/86. Loss of skid plate could lead to disengagement of both secondary & primary hood latches. Hood could open unexpectedly, contacting windshield, reducing driver's vision, & causing crash. (Correct by installing secondary latch skid plate and/or secondary latch skid plate retaining screws.)

88V-039	3-11-88	Chevrolet	Corsica Beretta	1987-88	282,052

DOM- 11/86-11/89. Secondary hood latch assembly may not have been properly adjusted resulting in latch becoming bent. Bent secondary hood latch could cause primary latch to malfunction and allow hood to unexpectedly open while vehicle in motion. Reduction of forward visibility could cause vehicle crash without prior warning. (Correct by inspecting & replacing secondary hood latch assemblies.)

88V-065	4-11-88	Pontiac Buick	Grand Prix Regal	1988	12,457

DOM- 6/87-1/88. Secondary hood latch may not properly engage. If primary latch disengages, hood could unexpectedly open. If car was in motion, hood could contact windshield, reduce driver's forward vision area, & result in accident. (Correct by replacing secondary latch.)

91V-135	8-13-91	Chevrolet	Corsica Beretta	1987-88	290,408

DOM- 6/86-11/87. Secondary hood latch assembly may not be properly adjusted & could become bent. Bent secondary latch could lead to primary latch not being fully engaged, allowing hood to unexpectedly open. Hood may contact windshield, reducing forward vision area of driver & vehicle crash could occur. (Correct by replacing primary hood latch assembly, secondary hood latch assembly, & support bracket.)

91V-166	9-17-91	Chevrolet Pontiac	Cavalier Sunbird	1992	3,212

DOM- 8/91. Secondary hood latch spring is improperly installed or missing, leading to condition where secondary hood latch does not engage secondary striker. If secondary hood latch is not engaged, & primary hood latch was also not engaged, hood could open unexpectedly. If this occurs while vehicle is in motion, hood may contact windshield, reducing forward vision area of driver & vehicle crash could occur. (Correct by inspecting hood latch assemblies & where necessary, installing new secondary hood latch spring.)

91V-186	10-21-91	Chevrolet Buick Oldsmobile	Caprice Roadmaster Custom Cruiser	1991-92	224,588

DOM-10/89-8/91. Secondary hood latch assemblies can corrode, causing high latch release effort & possible preventing hood from latching properly when it is closed. If secondary hood latch is not properly engaged, hood could open & contact windshield while vehicle is in motion, reducing forward vision area of driver, resulting in vehicle accident. (Correct by installing new secondary hood latch assembly.)

93V-189-001	11-23-93	Geo	Metro	1989-93	356,097

Mislocated spot welds of hood striker assembly cause cracks to start on hood inner panel. If cracks occur, hood striker assembly may not properly engage hood latch when hood is closed. improperly engaged hood latch may allow hood to fly up while vehicle is in motion, obstructing driver's view & causing accident. (Correct by installing two bolts & nuts to secure striker assembly to hood inner panel, plus ensure that hood latch assembly fasteners are properly tightened.)

95V-229	12-01-95	Cadillac	Concours Deville	1996	12,783

DOM - 7/95-9/95. Cars may have improperly adjusted secondary hood latch which does not conform to FMVSS 113. If secondary hood latch is not properly engaged & primary hood latch is also not engaged, hood could open unexpectedly. If occurs while car is in motion, hood can contact windshield, reduce vision of driver & result in vehicle accident. (Correct by adjusting secondary hood latch.)

NHTSA Identification #	Date of Company Notification	Make	Model	Model Year	Number of Vehicles
97V-232	12-10-97	Cadillac	Deville	1998	14,423

Mfg. Campaign No. 97070. DOM - 08/97-11/97. Hood hinge pivot bolts can break because of improper heat treat condition. Broken bolt can cause either corner of hood near windshield to rise, or one side of hood to be unstable when opened. This does not comply with requirements of FMVSS 219. In vehicle crash, hood could be pushed back through windshield glass, injuring vehicle occupants. (Correct by replacing hood hinge pivot bolts.)

HONDA

83V-131	12-6-83	Honda	Civic	1984	10,421

DOM—8/83-11/83. Tolerance errors of hood safety catch could allow accidental hood opening. If hood is not securely latched in full lock position, driving at high speeds or hitting large bump could cause hood to open suddenly. This would block driver's vision, causing driver to lose control and crash. (Correct by inspecting and replacing safety latch with proper part.)

HYUNDAI

90V-038	2-13-90	Hyundai	Sonata	1989-90	39,361

DOM- 28/89-10/89. Insufficient clearance could cause safety catch on secondary hood latch striker to bind. If primary latch is released or if hood is not completely closed, hood could fly open while vehicle is in motion. This would block driver's vision & could result in accident. (Correct by replacing hood latch striker assembly.)

MAZDA

00E-069	11-6-00	Mazda	RX7	1992-95	12

Mfg. Campaign No. 0100L. DOM: 6/97-9/00. On Speed Resinous hoods, designed & sold as accessory parts for model year 1992-1995 RX7, hook on hood striker could separate from base plate at welded portion due to insufficient welding strength. Hood may suddenly open during operation, losing front visibility & resulting in crash. Correct by replacing hood striker.

MERCEDES

96V-010	2-01-96	Mercedes	C220	1994-95	44,114
			C280		
			C360	1995	

Mfg. Campaign No.—96-0113. DOM - 01/93-05/95. In minor front impacts, hood latch hook may be damaged & not function properly as secondary safety catch as required by FMVSS 113. If hood is damaged & not fully latched, hood could fly up suddenly while car is driven, & result in accident. (Correct by replacing hood latch secondary hook.)

NISSAN

83V-125	11-22-83	Nissan	300ZX	1984	9,858

DOM—8/83-11/15/83. Inner panel of hood may be deformed causing misalignment of secondary hood latch. If when closing hood, primary latch is not properly engaged, misaligned secondary latch might allow hood to open during high speed driving. (Correct by inspecting and replacing secondary hood latches with improved latch.)

84V-139	11-2-84	Nissan	Pulsar	1983-84	86,000

DOM—(N/A). Hood latch assembly lever is designed to be pushed to right to disengage secondary hood latch. In event that someone was to mistakenly operate lever in incorrect direction with extremely strong force or by using a tool, hood latch assembly may be damaged and result in separation of secondary hood latch. If primary latch is not fully engaged or is released while driving, hood may open, obstructing frontal vision and cause accident. (Correct by inspecting and replacing with new redesigned hood latch assembly.)

PORSCHE

91V-012	1-15-91	Porsche	Carrera 4, 911	1989-90	2,451
			Coupe	1990	
			Targa		
			Cabrio		
			Carrera 2		

DOM-4/88-12/89. Luggage in luggage compartment and/ or plastic trim surrounding safety latch may prevent latch on front hood from properly locking. Latch failure could cause hood to open & obstruct driver's front view. (Correct by replacing plastic trim piece & installing bracket behind safety latch to prevent interference.)

NHTSA Identification #	Date of Company Notification	Make	Model	Model Year	Number of Vehicles
			SALEEN		
05V-413	09-16-05	Saleen	S281 Supercharged	2005	339

Mfg. Campaign No. STSB 06-05-01. DOM: 3/05-8/05. Bolts used to fasten hood latch and hinges to fiberglas body of hood can become loose. Hood may become loose and/or separate from its latch and/or hinge(s) resulting in crash. Correct by replacing hood bolts.

			SUZUKI		
93V-189	11-30-93	Suzuki	Swift	1989-93	38,229

Mislocated spot welds of hood striker assembly cause cracks to start on hood inner panel. If cracks occur, hood striker assembly may not properly engage hood latch when hood is closed. improperly engaged hood latch could allow hood to fly up while vehicle is in motion, obstructing driver's view & causing accident. (Correct by installing two bolts & nuts to secure striker assembly to hood inner panel plus ensuring that hood latch assembly fasteners are properly tightened.)

			TOYOTA		
94V-039	2-22-94	Lexus	ES300	1992	16,036

DOM- 7/91-1/92. Secondary hood latch mechanism has narrow clearance between internal parts which, over time, accumulate dust or other foreign matter & cause latch to not engage properly. If this occurs & primary latch is not properly engaged, hood could open suddenly without warning, blocking vision of driver, which could cause accident. (Correct by replacing secondary hood latch.)

			UTILIMASTER		
91V-073	4-26-91	Utilimaster	Aeromate	1990-91	541

DOM: 6/90-4/91. Primary hood latch can release when vehicle is driven in high wind gusts. Primary hood latch failure will also cause secondary hood latch to fail simultaneously. If primary and secondary hood latch failure occurs, hood can fly open and break one or both front windshields, blocking driver's vision, which could result in occupant injury and/or vehicle accident. (Correct by replacing defective primary and secondary latch mechanisms with a larger spring on primary latch, and a redesigned catch on secondary latch.)

97V-027	2-21-97	Utilimaster	Walk-in Van	1996-97	656

DOM - 01/96-10/96. When vehicle is being driven, force of wind against hood can force hood behind hood bumper, allowing hood to drop. This reduces tension on two rubber hold-downs which become loose. If both tie downs come loose, hood can separate during vehicle operation. This can lead to broken windshield and/or blocking of driver's vision & vehicle crash. (Correct by adding metal bracket & second hood bumper above & behind original bumper so that hood cannot be pushed or slip behind original, bottom, hood bumper.)

			VOLKSWAGEN		
98V-160	7-13-98	VW	Jetta Golf GTI	1993-96	238,000

Mfg. Campaign No. UC. DOM: 8/92 - 2/96. Bolts securing front hood latch can loosen over time. Latch would move causing disengagement of hood striker from latch. Unexpected opening of hood could occur, obstructing driver's view & increasing risk of crash. (Correct by inspecting hood latch & securing bolts & replace them if necessary.)

TOTAL: 40 Recalls of 5,858,852 Vehicles

Center for Auto Safety
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