are defined in the regulatory text of this final rule.

(6) Secondary Latched Position

AAMA, Mazda, Nissan, and Toyota opposed the proposal to require a secondary latched position in back doors on the basis that such a requirement would increase costs to manufacturers. Advocates and Rockwell, on the other hand, supported the proposal. NHTSA disagrees that this proposal would increase costs. On current designs, both the fully latched and secondary latched positions are provided by the same fork bolt detent lever. Typically, side door latches have two teeth on the detent lever with one tooth corresponding to the fully latched position and the other to the secondary latched position. The design load specifications for the latch assembly must be based on the load requirements for the fully latched position. Since the test load for the secondary latched position is less than that for the fully latched position, NHTSA believes the incremental cost for providing an additional tooth on the fork bolt detent lever to be negligible. This belief is based on a NHTSA cost/weight study, Cost Comparison—Two MY 93 Rear Door Latch and Striker Sets, NHTSA docket no. 94-70, Notice 01-001, in which the agency examined the costs of the 2 least expensive back door latches from the 8 latches it evaluated. One of the latches complied with the current requirements of Standard No. 206, while the other did not. The better latch had the lowest production and purchase prices. In addition, the better latch had both the fully latched and the secondary latched positions, while the inferior latch had only the fully latched position. As previously noted, NHTSA believes that the back door latches of most current production minivans and station wagons already have 2 latch positions. Accordingly, the agency does not believe that back door latches would require any major design changes in order to comply with the proposed fully latched and secondary latched position requirements.

(7) Incorporating Latch/Hinge Tests With Other Tests

Rockwell commented that NHTSA should consider incorporating latch/hinge tests into an existing crash test or a modified existing crash test. Advocates suggested that NHTSA consider roof strength performance standards in determining how roof strength in full rollover crashes affects back door retention.

The agency agrees with the concept of combining tests where possible, and has

done so in certain recent rules (see, for example, S5.3.1 and S5.3.2, Standard No. 214, Side impact protection. S5.3.1 requires that any side door struck by the moving deformable barrier shall not totally separate from the vehicle. S5.3.2 requires that any door, including a rear hatchback or tailgate, not struck by the moving deformable barrier shall not disengage from the latched position, nor shall the latches or hinges separate or pull out of their anchorages). Taking such a step would not eliminate the necessity of bench testing of latches as components, however, since the agency wishes to assure the safety of latches under all possible crash conditions and loadings. To ensure that latches are safe in all crash modes, a system level test would require several tests which would be impractical and costly. In addition, if such an approach were used, the agency would need to develop new test procedures for such latch evaluation.

(c) Interior Lock Mechanisms

Except for most station wagons with third seats in the rear of the vehicle, many production vehicles have neither locking mechanisms nor inside door handles on their back doors. Thus, unlatching cannot be accomplished from the inside. The agency has received several complaints about this, citing the potential danger of being trapped in the rear compartment area of a vehicle, especially young children, in fire or submersion situations. While agency accident data do not show this as a significant safety problem, NHTSA nevertheless requested comments in the NPRM on whether the requirements for front and/or rear side door locks should be extended to back doors.

Four commenters opposed requiring door locks on the back doors, one supported it, and one (Mitsubishi) requested clarification of the term "locking mechanism with an operating means in the interior of the vehicle' (S4.1.3, Standard No. 206). AAMA, Toyota, and VW argued that there is no need or justification for back door locks. AAMA and Toyota repeated their assertions that back doors are not intended for passengers, and Rockwell stated that a properly designed system does not need a lock. Nevertheless, Toyota stated that lock requirements would be appropriate for back doors designed for passenger ingress and egress. VW stated that if a back door locking requirement were adopted, both the inside and outside door handles or other release mechanism should be inoperative when the locking mechanism is engaged. Rockwell stated that if a locking requirement were

adopted, the inside handle should be disengaged either electrically or manually when the vehicle is moving. Rockwell also stated that if a lock were required, an inside handle should also be required. Advocates stated that locking requirements should be prescribed for all back doors, regardless of design, in view of increased risk of multiple back door ejections because of back door lock disengagements.

Standard No. 206 requires door locks in order to reduce unintentional door openings due to impact upon or movement of the inside or outside door handles (see 33 FR 6465, April 27, 1968). The standard requires the locks to engage so as to render the exterior front door handles inoperative and both the exterior and interior rear side door handles inoperative. Standard No. 206 does not specifically require doors to have door handles. However, many manufacturers already voluntarily provide inside handles on back doors of station wagons with third seats.

NHTSA concludes that back doors that lead directly into a passenger compartment or that are otherwise already equipped with an interior door handle shall be equipped with a locking mechanism with operating means in both the interior and exterior of the door. The reason for this is similar to the reason door locks are required for side doors, i.e., to prevent inadvertent door openings due to impact upon or movement of the interior or exterior door handles. NHTSA acknowledges that the back doors of some vehicles so equipped are designed for loading and unloading cargo rather than passengers. Nevertheless, sometimes those doors are also used for ingress and egress of back seat occupants. Therefore, if doors designed primarily for loading and unloading cargo lack an interior door handle, no door lock is required. If an interior door handle is present, this rule requires a means for making the door handle (a door release mechanism) inoperative when the locking mechanism is engaged. Further, when the locking mechanism is engaged, both the inside and outside door handles or other latch release controls must be inoperative.

(d) Vehicle and Other Exclusions

Five commenters addressed the applicability of the proposal to passenger motor vehicles with a GVWR of 4,536 kg (10,000 pounds) or less. The National Truck Equipment Association (NTEA) stated that most multi-stage produced vehicles can demonstrate compliance with safety standards only to the extent that the chassis manufacturer passes through its