certification. NTEA stated further that many such manufacturers will permit their certification to pass through only if no changes or alterations are made to their components by the final-stage manufacturer. Thus, NTEA argued that in cases where doors are widened or lengthened, such as for ambulances and vehicles for physically challenged persons, there can be no pass-through. In those situations, NTEA said that final-stage manufacturers, most of which are small businesses, would be obliged to assume the burden and expense of compliance testing themselves. NTEA suggested, therefore, that NHTSA either lower the GVWR level for this rule to 2,721 kg (6,000 pounds) or exclude all vehicles built on a truck type chassis in 2 or more stages and equipped with a body designed for carrying cargo, or work-performing or specialty equipment such as that found on ambulances, fire trucks, and the like.

AAMA suggested that hinged windows, liftglass, and glass hatches should be exempt from the proposed requirements because glazing in those configurations typically would yield in a crash before the hinges and latches would fail. Similarly, Isuzu suggested that the glass top portion of split doors on which the striker and hinges are installed on the glass itself should be exempt. Mazda stated that extending Standard No. 206 requirements to back doors that have large window openings or large glass areas will have little or no effect in reducing unbelted back door ejections since occupants could be ejected through the window opening. Finally, similar to NTEA's suggestion, Nissan suggested that back doors designed for loading and unloading cargo be excluded from the rule.

NHTSA recognizes that there is a substantial number of vehicles produced by businesses involved in manufacturing vehicles in more than one stage, and in converting or altering MPVs (e.g., van converters). Many of these are small businesses. Final-stage manufacturers typically install truck bodies and/or work-related equipment on chassis. Alterers modify the structure of new, completed vehicles. Under NHTSA's regulations, a final-stage manufacturer must certify that the completed vehicle conforms to all applicable safety standards, and alterers must certify that the altered vehicle continues to comply with all applicable safety standards.

The impact of this rule on commercial vehicles will not be significant. This rulemaking does not apply to buses or trucks such as cargo vans and many specially-designed and equipped commercial vehicles. The proposal only applied to passenger motor vehicles such as station wagons, hatchbacks, and MPVs with a GVWR of 4,536 kg (10,000 pounds) or less. An MPV is defined in 49 CFR 571.3 as a motor vehicle ''designed to carry 10 *persons* or less'' (emphasis added). Examples of MPVs include passenger vans and sport utility vehicles. MPVs also include motor homes, ambulances, and other customized *passenger* vehicles. Except for ambulances, some of those vehicles do not have back doors and will therefore not be affected by this rule.

In response to NTEA's concerns, as to final-stage manufacturers and alterers that produce vehicles that are subject to today's rule, it should not be difficult for those entities to satisfy their certification responsibilities with respect to Standard No. 206. NHTSA believes that many final-stage manufacturers should be able to meet the requirements of Standard No. 206 by utilizing the latch and hinge systems that were originally certified by the incomplete vehicle manufacturer as complying with the standard. Even if the final-stage manufacturer or alterer cannot use the original latch and hinge systems, it should not be unduly burdensome for those entities to obtain back door latch systems that comply with Standard No. 206 and certify compliance of their vehicles with the standard. Latch designs similar to those used for side doors can be used for back doors in many MPVs and are commercially available at low cost. Side doors of new vehicles are currently subject to Standard No. 206, and this rule essentially only extends those side door requirements to back doors. Thus, the certification responsibilities of final-stage manufacturers and alterers under Standard No. 206 with respect to back doors should be very similar to their current responsibilities under Standard No. 206 with respect to side doors. Moreover, the test burdens associated with this final rule are not significant.

This rule specifies a relatively simple component test that provides for bench testing of latches and hinges. It does not specify a dynamic test requirement. Manufacturers and alterers may, but are not required, to test their vehicles using the test procedures specified by Standard No. 206. The test procedures of Standard No. 206, like those of all other Federal motor vehicle safety standards, set forth the test procedures NHTSA uses in its compliance testing. In view of the standards to which manufacturers and alterers already certify and the manufacturing operations they undertake, final-stage manufacturers and alterers should have the necessary technical expertise and resources to certify to the back door standards. Alternatively, those final-stage manufacturers and alterers who install back door latches could require that their suppliers provide certification that their back door latch systems comply with the requirements of the standard. NHTSA does not require final-stage manufacturers and alterers themselves to conduct the testing specified in this final rule.

NHTSA agrees with the suggestions of AAMA and Isuzu that windows and doors on which latch/hinge systems are mounted directly onto the glazing (glass, glass/plastic, or plastic) should be excluded from the standard. In virtually all such cases, the glazing would fail before the latch and/or hinge fails. Thus, strengthening the latches and hinges on those doors would not prevent them from opening. The agency disagrees, however, with Mazda's suggestion that doors containing large glass areas be excluded. While it may be true that occupants could be ejected through large windows in back doors, the agency believes that ejection is less likely when the doors remain closed than if they opened. With a closed door, the occupant may be retained by the door structure and not ejected through the window. Thus, the agency has included back doors in this final rule, regardless of the size of the windows in those doors, because upgrading the strength of latches and hinges is needed to better ensure that those doors remain closed in a crash.

Finally, the agency does not agree with Nissan's suggestion that back doors designed for loading and unloading cargo be excluded from the rule. Even though back doors in many vehicles may be designed primarily for cargo loading and unloading, an unbelted occupant can be ejected through those doors in a crash. NHTSA's data show that back doors in general open more frequently than side doors, and that the majority of back door ejections occurred from hatchback cars, passenger vans, and utility vehicles. The back doors of those vehicles are designed primarily for cargo loading and unloading. However, occupant ejections through those doors, especially unbelted occupants, are a serious safety problem. Accordingly, by this final rule the agency extends the requirements of Standard No. 206 to the latch and hinge assemblies of back doors of passenger cars and MPVs, and to the locks and interior release mechanisms of back doors equipped with interior door handles or that are designed for passenger ingress and egress. Nissan's suggestion, therefore, is not adopted.