hatchback latches tested, 1 failed all tests, another failed Load Test One in both positions and Load Test Two in the secondary latched position. The remaining 3 hatchback latches failed Load Tests One and Two in the secondary latched position. Two station wagons passed all 6 tests. The MPV which did not have a secondary latched position failed Load Test Two in the fully latched position. One MPV failed Load Tests One and Two in the secondary latched position, another failed Load Test One in the fully latched position. Finally, a sport van failed 4 of the 6 tests. These tests showed again that latch price is not directly related to the latch's level of performance. The tests also showed that many of the current production light passenger vehicles already comply with the back door latch requirements of this rule. NHTSA believes that all production latches could comply with the requirements of this rule with only minor modifications, and that the costs of complying with the secondary latched position requirement are negligible to none. Thus, NHTSA believes that extending the requirements of Standard No. 206, including the addition of Load Test Three, will not result in any significant increase in production costs. The agency also concludes that the cost of complying with the secondary latched position requirement, if needed, could cost up to \$1.00 per latch.

The agency also tested the back door hinge systems of 11 production vehicles. Load Test Two was not conducted on one vehicle hinge and Load Test Three was not conducted on 2 others. Those three components were judged to be strong, however, and their ultimate strength is expected to exceed the requirements as proposed. Aside from those 3, all hinges passed all the tests to which they were subjected.

To estimate the incremental new vehicle costs from upgrading hinges, the agency began by examining the replacement part costs of both the side door and back door hinges of a series of production vehicles. All vehicles had side doors with 2 hinges, but some of their back doors had auxiliary hinges that allowed those doors to open in different directions. The consumer replacement prices for primary hinges ranged from \$40 to \$120 for a pair of side door hinges and \$20 to \$100 for a pair of back door hinges. The agency calculated that the weighted average consumer price of replacement side and back door hinges would be about the same, approximately \$53 per pair. Thus, NHTSA estimates that the incremental consumer cost to upgrade back door

hinges, if improvements were required, would range from \$0 to \$20 with an average of about \$10 per pair of replacement hinges. NHTSA emphasizes that those prices are estimated consumer replacement costs which are usually much higher than new vehicle consumer costs. Thus, based on NHTSA's estimates that incremental production costs are less than 15 percent of retail consumer costs, NHTSA estimates that the incremental production costs for necessary hinge improvements, if needed, would range from \$0 to \$3.00.

With respect to the issue of back door locks and interior release handles, NHTSA examined 24 station wagons, some with back doors designed for passenger ingress. Fourteen had either rear or side-facing third seats in the rear of the vehicles, the other 10 did not have the third row of seats. Twelve of the 14 vehicles in the former group had inside door handles, while none in the latter group did. It appears, therefore, that most manufacturers have already voluntarily addressed the issue of occupant ingress and egress through back doors by providing inside door handles on their station wagons equipped with a third row of seats. Accordingly, since most mid and large size station wagons already have a locking system similar to that specified in this final rule, as do ambulances and motor homes, NHTSA estimates that incremental costs for lock improvements needed to comply with the requirements of this final rule are minimal, no more than \$1.00 per vehicle.

(2) Estimated Lives Saved

NHTSA has previously noted that the door latch requirements of Standard No. 206 have reduced the risk of side door ejections in rollover crashes by at least 15 percent, saving at least 400 lives per vear (see section I(c)(6) above on costs and benefits of the proposal). The 1990 report concluded that a hatchback or tailgate was 3 times as likely to open in a crash as one of the front doors and 7-8 times as likely to open as one of the rear side doors. Further, the back door of a van is 4 times as likely to open as one of the front doors and twice as likely to open as the right rear side door (passenger vans seldom have a left side rear door). NHTSA believes, therefore, that extending the requirements of Standard No. 206 to back doors will be as effective in reducing back door openings as the standard's requirements have been in reducing side door openings. This is because the back door requirements will include 3 tests instead of the 2 currently required.

Accordingly, by applying that effectiveness value to the estimated noncomplying target vehicle population, NHTSA estimates that 13 lives will be saved and 17 serious injuries prevented annually by extending the requirements of Standard No. 206 to back doors.

(3) Estimated Cost/Benefit Ratio

As discussed in section IV(a) above on the projected vehicle fleet, NHTSA projects that approximately 5.2 million vehicles equipped with back doors will be produced in 1997. This target vehicle fleet is expected to consist of 1.9 million passenger cars and 3.3 million other types of light passenger vehicles. NHTSA further estimates that approximately 0.4 of the 1.9 million passenger cars will be station wagons (0.24 million mid and large size station wagons and 0.16 small station wagons) and 1.5 million will be hatchbacks. Based on the agency's test results, NHTSA estimates that approximately 190,000 of the mid and large size station wagons and approximately 20,000 small station wagons will be equipped with third seats and, therefore, required to meet the proposed door lock requirements. In addition to station wagons, an estimated 2,500 ambulances, mostly with 2 back doors, and 20,000 motor homes, mostly with 1 back door, will be produced in 1997. The agency estimates, therefore, that approximately 240,000 vehicles produced in 1997 will be required to be equipped with back door locks. The agency also estimates that 1.5 million hatchbacks and 1.1 million MPVs produced in 1997 may require some minor latch modifications other than providing a secondary latched position at minimal cost. In all, NHTSA estimates that about 55 percent of the vehicles expected to be produced in 1997 will require some minor improvements in their latch and/or lock designs under this rule at a total estimated cost of up to \$1,740,000, not including potential costs for compliance testing. The agency also concludes that hinge improvements will not be necessary. Accordingly, using the projected safety benefits of this final rule, that is, prevention of approximately 13 fatalities and 17 serious injuries annually, the annual cost of this rulemaking action is estimated to be approximately \$112,000 per equivalent life saved.

V. Rulemaking Analyses and Notices

(a) Executive Order No. 12866 and DOT Regulatory Policies and Procedures

This rulemaking document was not reviewed under E.O. 12866, Regulatory