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[REDACTED] • ROCKFORD, ILLINOIS • [REDACTED]

EMAIL - [REDACTED] 2005 FEB 17 PM 11:39

February 9, 2005

U.S. Department of Transportation  
National Highway Traffic Safety Administration  
Office of Defects Investigation  
NSA-10.01, 400 7th Street, SW  
Washington, DC 20590

Dear Sir or Madam:

I am a consulting engineer who has been involved in evaluating automobile transmissions since 1971. My particular involvement has focused on incidences where the driver left the vehicle with the engine running and with the belief that the transmission selector lever was in PARK. Sometimes the transmission selector lever would move into REVERSE. The car would then move backwards in powered REVERSE and cause personal injury. These cases are often called ILLUSORY PARK incidents. A recent particular incident has prompted me to write you and to petition you to issue a requirement for corrective measures.

On February 28, 2003, [REDACTED] drove his 1986 Chrysler LeBaron through an open gate. He stopped the car and, unknowingly, placed it in ILLUSORY PARK. As he was securing the gate the transmission moved into REVERSE. The car then moved rearward and struck him. He was discovered a few minutes later pinned under the car. He died from injuries received in that accident.

The [REDACTED] incident is only one example of many incidents of this type I have investigated. Accidents of this description occur commonly and can be prevented by a simple modification of the selector lever. The selector lever for the [REDACTED] vehicle is shown in the enclosed photograph. This is a typical console-mounted selector lever. Note that a palm button is used to control movement into and out of PARK. The position indicator (the PRNDL indicator) is vague, hard to read, and, for this vehicle, not illuminated. The indicator is particularly hard to see at night, when the [REDACTED] incident occurred. Observe, for comparison, the selector lever shown for the 2003 Subaru. This design, which is notched and requires the driver to use lateral motion to place the lever into or out of PARK, makes the driver well aware of the selector lever position. This simple, nearly cost free, design will virtually eliminate the confusion where the driver believes the lever is in PARK while, in fact, it is in ILLUSORY PARK.

It is established that drivers rarely use the PRNDL indicator to determine whether they are in PARK. They use the end-of-travel indication. History has shown that this is not a suitable indicator. If lateral motion was required the driver would know with certainty that the system is in PARK.

Continued on Page 2 . .

*Transferred to  
Rube Maffey  
3/1/05  
a c s*

February 9, 2005

NHTSA has studied the issue of ILLUSORY PARK for many years. There was a "C2" report issued in the late 1960's. Certainly car manufacturers have improved the selector lever system over time. For example, they now rarely use a flat zone on the contour of the inner manual lever between PARK and REVERSE, while at one time this was common. I suggest that now is the time to require manufacturers to incorporate this notched, lateral-motion design into their selector levers that would virtually eliminate ILLUSORY PARK incidents for those cars that use a console-mounted selector lever. Some, but not all, new cars use lateral motion to control motion of the selector lever. My request is that you make it a requirement that all console mounted selector levers be properly designed with this feature.

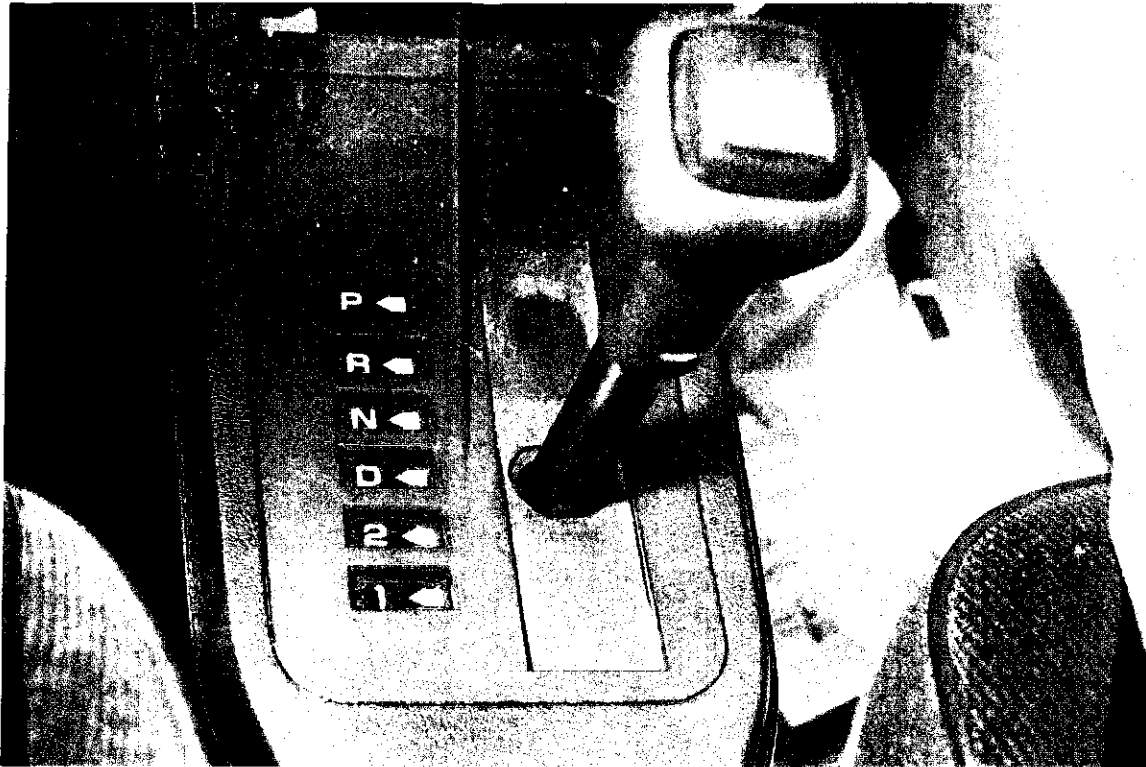
Sincerely,



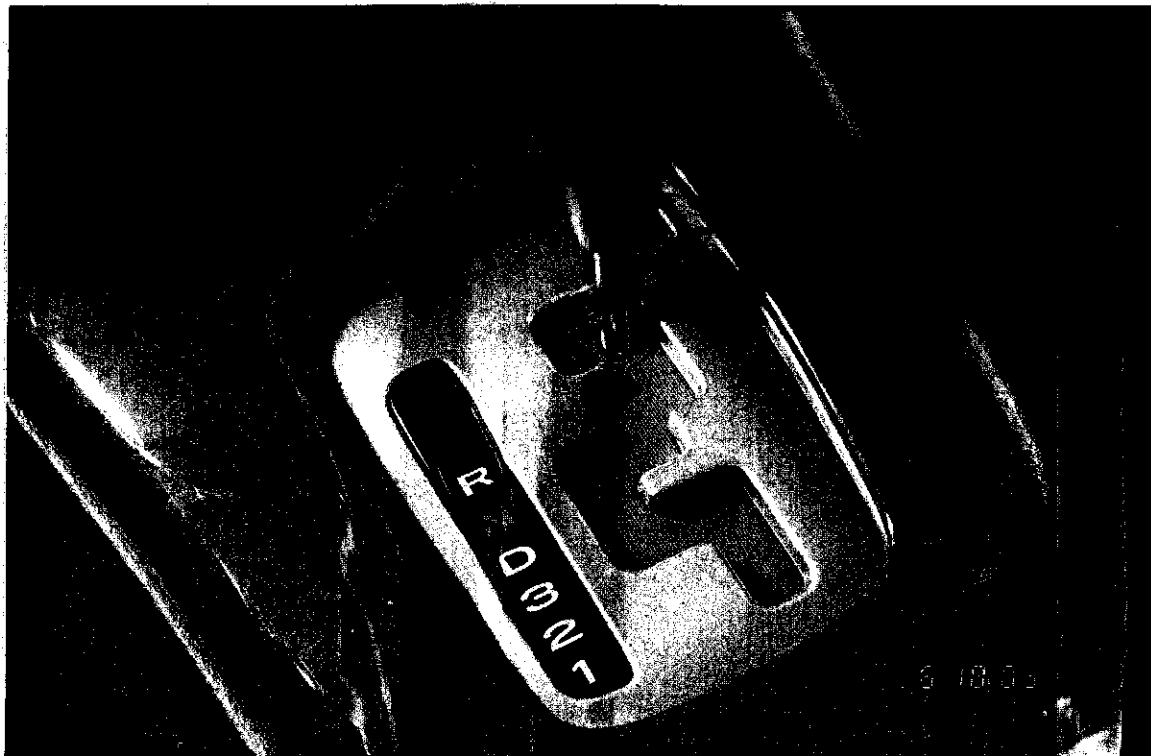
President

NJM:mfm

Enc: Two Photographs of Selector Lever Designs



1986 Chrysler LeBaron Selector Lever



2003 Subaru Selector Lever Design