



U.S. Department of Transportation
**National Highway Traffic Safety
Administration**



October 26, 2018

The Honorable Robert P. Casey, Jr.
United States Senate
Washington, DC 20510

Dear Senator Casey:

Thank you for your letter to the National Highway Traffic Safety Administration (NHTSA) regarding Federal Motor Vehicle Safety Standard (FMVSS) No. 114, *Theft Protection and Rollaway Prevention*. In your letter, you urge NHTSA to finalize a rulemaking to establish safety standards for vehicles equipped with keyless ignition control systems to prevent further carbon monoxide poisoning incidents from occurring. Additionally, you ask that NHTSA reconsider including a timed, automatic shutdown requirement that would apply to both new and existing vehicles. You also ask that NHTSA begin data collection of carbon monoxide deaths resulting from keyless ignition vehicles and share this data with the Senate Committee on Commerce, Science, and Transportation and your office on an annual basis.

NHTSA shares your concern regarding the safety of keyless ignition systems. In addition to the regulatory proposal you cited, NHTSA has taken several other actions in this area. To alert consumers to potential safety issues involving the use of keyless ignition systems, the agency produced a video highlighting the proper way to operate vehicles with keyless ignition systems and providing drivers tips to prevent dangerous situations from occurring. This video is available on YouTube and NHTSA's website via these links:

<http://www.safercar.gov/Keyless>

https://www.youtube.com/watch?v=aNKY_JvKSpU

In addition to the numerous comments received in response to the 2011 NPRM, NHTSA is evaluating a range of options to determine the best path forward to address safety concerns related to keyless ignitions. NHTSA is considering advances in technology, such as auto shut-off, as well as NHTSA's investigation reports, to inform agency actions. NHTSA is also evaluating the best ways to quantify the safety problem as it is difficult to accurately obtain reliable data because these cases fall outside NHTSA's normal data acquisition channels.

NHTSA is continually working to gather information on vehicle-related carbon monoxide injuries and fatalities. This data does not come directly to NHTSA because these injuries and fatalities nearly always happen off-road and do not involve vehicle crashes. Instead, the data

1200 New Jersey Avenue SE., Washington, D.C. 20590

Page 2

The Honorable Robert P. Casey, Jr.

must be gleaned from carefully examining other sources like narrative descriptions on death certificates provided by the Centers for Disease Control's National Vital Statistics System, emergency department records contained in the National Electronic Injury Surveillance System-All Injury Program, or fire or news reports. The content and quality of these information sources vary widely and ready access to them is not always available. For example, while NHTSA relies on the first two sources of data in its Not-in-Traffic Surveillance (NiTS) System, they do not provide sufficient detail to determine whether the incidents involve keyless ignition. Fire reports, a data source to which NHTSA does not have regular access, also often lack detail about the source of carbon monoxide.

Despite the challenges in obtaining relevant data, NHTSA continues to look for ways to better understand the extent of the problem of keyless ignition-related carbon monoxide injuries and fatalities. For example, while incidents reported in the news are not nationally representative, NHTSA uses information from the news reports along with complaints submitted to NHTSA to identify carbon monoxide incidents to investigate. NHTSA has completed eight reports related to carbon monoxide poisoning (copies attached). The reports can also be accessed via the link below.

<https://crashviewer.nhtsa.dot.gov/legacySCI/Index> (Choose "NITS – CO Poisoning" from the SCI Case Type dropdown.)

NHTSA appreciates your commitment to keeping the American public safe. I hope you find the information helpful. If you have any questions, please contact me or Mr. Brian Barnard, Director, Governmental Affairs, Policy and Strategic Planning, at 202-366-2386.

A similar response has been sent to each cosigner of your letter.

Sincerely yours,

(b)(6)

Heidi R. King /
Deputy Administrator

Enclosures