

We believe that the new, proposed tables would simplify a search for a symbol and show when a symbol is used for several different displays (control, indicator, or telltale). The symbols in the proposed tables are essentially identical to the ISO symbols.

1. *Table 1.* As indicated above, the proposed Table 1 lists controls, telltales, and indicators for which we are proposing an illumination or color requirement. Column 1 of the table names the control, telltale or indicator, column 2 specifies the required symbol, column 3 indicates whether the item is a control, telltale, indicator, or some combination of control, telltale, or indicator, column 4 states whether illumination is required for that item, and column 5 specifies the required color, if any. All controls, telltales, and indicators that had an illumination or color requirement in the present Tables 1 and 2 are proposed to be included in new Table 1.

a. *Items in Proposed Table 1 Not in the Current Tables.* The following items are proposed to be included in the new Table 1, but do not appear in either of the current FMVSS 101 tables: (1) The controls and telltales for front and rear fog lamps and parking lamps; (2) the telltale concerning air bag malfunction required by FMVSS 208; and (3) the engine on-board diagnostics telltale required by emissions standards.

b. *Air Bag Malfunction Telltale.* While FMVSS 208 requires a telltale concerning air bag malfunction, the identification is not specified. This has resulted in manufacturers using different identifications, e.g., "SRS" or "INFL REST". We propose to require the ISO symbol for air bag malfunction to make the display uniform in all vehicles.

c. *Malfunction of Trailer ABS Telltale.* Table 1 includes a telltale indicating a malfunction of trailer antilock brake system (ABS). We note that the symbol for the telltale is not identical to the ISO symbol. The ISO specifies a symbol that indicates which trailer, in a rig hauling multiple trailers, is experiencing the problem. To our knowledge, no current vehicle has this sensing capability. FMVSS 121, *Air Brake Systems*, requires tractor and trailer ABS malfunctions to be identified separately. However, only one telltale is required for trailer ABS malfunctions, regardless of the number of trailers. The ABS malfunction telltales proposed in Table 1, if adopted, would permit compliance with braking standards. The ISO symbol, which includes numbered trailers, on the other hand, represents a capability not required by any country's safety standard, and therefore would require

more than is necessary for compliance with braking standards. We believe that manufacturers currently do not plan to use that symbol because standard tractor/trailer wiring systems have too few lines to make it possible to communicate information indicating which trailer is experiencing the problem.

d. *Required Use of Symbols and Word Identifiers for Brake Telltales.*

FMVSS 101 currently specifies that for controls and displays for which a symbol is shown in the standard's tables, the control or display must be identified by either that symbol or by the word or abbreviation shown in the tables. The standard requires some items, including the brake system malfunction telltales required by FMVSS 105 and 135, to be identified by words.

In proposed Table 1, identifying words or abbreviations have been eliminated for all telltales, except for the brake system malfunction telltales regulated by FMVSS 105 and 135, for which the word "BRAKE" is incorporated into the symbols. We are proposing to require the word "BRAKE", in addition to the ISO symbol, for these telltales to aid consumers in correctly interpreting the meaning of the brake symbols during a five-year learning period.

The requirements for the word "BRAKE" would end after the five year period. We believe that five years is enough time to enable the American public to learn the meaning of the symbols. We seek public comment on the length of this period.

We believe that requiring the use of a standardized set of symbols would promote safety by making the manner of identification of controls, telltales and indicators uniform across the fleet, thereby reducing driver distraction. It also harmonizes U.S. requirements and symbol usage with Canadian and UN/ECE standards.

e. *Air Bag Deactivated Telltale.* The advanced air bag requirements of FMVSS 208 include, for vehicles that have automatic suppression features, a requirement for a telltale that indicates whether the passenger air bag is deactivated. See S19.2.2. Among other things, the telltale must have the identifying words "PASSENGER AIR BAG OFF" or "PASS AIR BAG OFF" on the telltale or within 25 mm (1.0 in) of the telltale. The advanced air bag requirements are being phased in on a mandatory basis beginning September 1, 2003. We have decided not to propose any change in FMVSS 208's requirements for this telltale at this time, i.e., it will continue to be required

to have the identifying words "PASSENGER AIR BAG OFF" or "PASS AIR BAG OFF" on the telltale or within 25 mm (1.0 in) of the telltale.

f. *Speedometer.* As with the existing version of FMVSS 101, a vehicle's speedometer would be required to be identified with "MPH, or MPH and km/h". The intent is to require speedometer display in MPH, and to allow the addition of km/h at the option of the manufacturer. This differs from the requirements of many other countries. However, as we explained in a final rule published in the *Federal Register* on May 15, 2000 (65 FR 30915), speedometers graduated in km/h only would be useless for drivers in the U.S., where speed limits are communicated in MPH alone.

2. *Proposed Table 2.* As discussed earlier, proposed Table 2 specifies symbols for the controls, indicators and telltales that are not listed in Table 1. Proposed Table 2 items have no illumination, location, or color requirements. A vehicle containing an item listed in either proposed Table 1 or Table 2 would be required to use the symbol listed for the item, regardless of the vehicle's weight class.

G. *Objectivity*

Comments are requested on increasing the objectivity, and thus the enforceability, of the performance requirements proposed in this document. For example, is there an appropriate way to increase the objectivity of the proposed requirement that "Any indicator or telltale not listed in Table 1 and any identification of that indicator or telltale must not be a color that masks the driver's ability to recognize any telltale, control, or indicator listed in Table 1" (Proposed S5.4.2)? What colors mask the specified colors in the tables, and under what circumstances, i.e., is masking partly a function of the distance between two of these items and the relative brightness of the two items?

H. *Common Space for Displaying Multiple Messages*

FMVSS 101 currently specifies that a common space may be used to display messages from any sources, subject to several requirements. One of the requirements is that the telltales for the brake, high beam, turn signal, and safety belt may not be shown in the common space. These telltales are of particular safety significance. This requirement ensures that these telltales, if activated, are always visible to the driver.

We are proposing to modify this requirement in a way that will provide increased flexibility. Under our