

2008 -

가	08 - 04
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202

가

Legislation Impact Assessment of Making Federal
Motor Vehicle Safety Standard No. 202 Head
Restraints For Passenger Vehicles

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국문 요약

(National Highway Traffic Safety Administration, NHTSA) 가() .

가

202

(FMVSS NO. 202 Head Restraint For Passenger Vehicles,

'2004) NHTSA

(Final Regulatory Impact Analysis) .

, 2004

NHTSA 가 (Supplemental Final Regulatory Evaluation) 2007 (FMVSS No. 202a

Head Restraints) . 2007

2004 .

2004 NHTSA

(passenger cars), (pickups), (vans), (utility vehicles)

H-point 가 800mm(31.5 inches) 2004 가 .

2004

H-Point 750mm

. 2004

가

750mm

55mm

, NHTSA

2004

()

(

)

가

. NHTSA

, 2004

15,272

1,559

16,831

. 2004

6 6

7

1 2 8

, 4 7

8 4 2

7 1

(6 6 7

+ 3 4

),

1 4 1

\$4.51,

\$1.13,

\$5.42

, NHTSA

, NHTSA

가

가 ,

(center high-mounted stop lamps)

. NHTSA

가

. , NHTSA

, NHTSA equi-

valent life saved (cost-effectiveness analysis) . , 7% , 1
 equivalent life saved 2 3 9 , 4
 7 1 , 2 6 1 .

I. NHTSA가 2004 가(
 .) 가 NHTSA
 . ,
 가

II.
 (whiplash injury) (head restraint)
 , , (backset)
 . ,
 202 (Federal
 Motor Vehicle Safety Standard, FMVSS NO. 202 Head Restraint For Pas-
 senger Vehicles) ,
 2004 가, 2004
 「 NO. 17(Economic
 Commission for Europe Regulation NO. 17, ECE 17) “ ,
 ”(Uniform Provisions
 Concerning The Approval Of Vehicles With Regard To The Seats, Their
 Anchorages And Head Restraints) (異同)

III. 2004 . ,
 , 1969 1 ,

1991 8 31 FMVSS No. 202

가
700 mm(27.5 inches) FMVSS No. 202

가 가 1982 NHTSA 가
(28.3%)가 (16.7%))
, 2004 48

IV. 2004
H-point 750 mm(29.5 inches) 800 mm(31.3 inches)
가 (,
800mm(31.3 inches)), 55 mm(2.2 inches)

. 1.
2004

NHTSA 가 ,
J826
700 mm
가 ()
NHTSA , 2004 ECE (異
同) . 2. 2004
FMVSS No. 202
가

. 3. 2004
 NHTSA 50mm , 0 가
 . , NHTSA 50mm
 800mm (750mm
) 가 . NHTSA
 (ICBC, Transport Canada)
 (AAM, UMTRI, GM, Ford, AIAM) , UMTRI
 91mm 99%가
 . 4.

가 , 2004
 가 800mm(31.3 inches)
 55mm . 5.
 1949 가 UN

, , , , ,
 , ECE 17
 25가 2004 가 . ,
 , , , 2004
 . 6. 가

가
 . 7.
 2004
 2008 9 1 (2004 9 1

202 3) 가 , FMVSS No.

V. 2004 . 1993 가 . 1987-1988

가 . 1998 (NIC)

2004 , ,

. 1. 14 , 2004 . 2.

. , 가 93%(1998), 가 80%(1998) . 3. (sled test)

2004 .

VI. () . 1. (27 : , 가 , , ,) () ,

LTVs,

2. IIHS 가 (good, acceptable, marginal, poor) 가 가 800mm(31.5 inches) , 55mm(2 inches) 24%

3. NHTSA 가 . 가 FMVSS No. 202가 1968 88%가 , FMVSS No. 202가 1969 88%가 , 17%, 10% 13.1% . 8 가 6.08% . 13.1% . 4. 가 가 (767mm(30.2 inches)) 2004 (800mm) 33mm(1.3 inches) 가 1.83% . 5. 가 . NHTSA 가 . , (2004 가 IIHS . , , , 4 가 . ,)

NHTSA

. 6.

767mm

75mm , 2004

800mm

1.68% 3.5% 가 ,

75mm

55mm

3.5% 가

가

5.83(3.5/0.6)%가 .

NHTSA 4가

. 7.

가

가 31.5inches

55mm

×

NHTSA

4가

VII.

1

\$31.50

\$1.65 . 2004

6 6 7

NHTSA 4가

VIII.

1

-

. , NHTSA

가

equivalent

life saved

-

IX.

2004

NHTSA가

가

「 (Small Business Regulatory Enforcement Fairness Act, SBREFA) (Regulatory Flexibility Act, RFA) (small entities) 2004
 「 (Unfunded Mandates Reform Act of 1995, UMRA) , 가 .

X.

. , NHTSA (7% 2004
 equivalent life saved 3 3 9 5 ,
 equivalent life saved 5 7 2)

XI. 2004
 NHTSA가 가 가
 .
 2004
 2007 2004

키워드 : 머리지지대, 백셋, 비용-효과분석, 규제영향분석, 규제영향평가, 입법평가

Abstract

The purpose of this study is to provide helpful reference materials in establishing models that can enhance competences of our government and the agencies in performing the efficient legislation and legislation impact assessment through examining and analyzing US NHTSA's legislation impact assessment(technical and economic analyses). In order to achieve this purpose, I explored the reasonableness of making FMVSS No. 202 Head Restraints For Passenger Vehicles(hereinafter '2004 final rule') by studying NHTSA's report, Final Regulatory Impact Analysis. 2004 final rule can result in the reduction of whiplash injuries by requiring front seat head restraints in passenger vehicles(passenger cars, pickups, vans, and utility vehicles) to be capable of achieving a height where the top of the head restraint is at least 800 mm (31.5 inches) above the H-point(which represents the normally seated 50th male hip point). 2004 final rule would also add a lower limit on height; head restraints in all front outboard seats may not less than 750 mm (29.5 inches) from the H-point. 2004 final rule would not require rear outboard head restraints, but would specify that if head restraints are installed they must be at least 750 mm. It also would require in front seats only that the distance between the back of the head form representing the position of a 50th percentile head, in a normally seated position, and the head restraint (defined as backset) be no farther than 55 mm (2.2 inches) in any adjustment position.

According to NHTSA's report, the reasonableness of making 2004 final rule was decided by regulatory impact assessment through cost-effective analysis of health-benefit(whiplash injuries reduced) and implementing costs.

NHTSA has estimated the benefits and costs of 2004 final rule. The benefits of increasing the height of head restraints and limiting the backset of head restraints are estimated to be 16,831 total whiplash injuries reduced (15,272 in the front seat + 1,559 in the rear seat). Average costs per vehicle are estimated to be \$5.42(\$4.51 in front seats, \$1.13 in rear seats). Total cost per year is estimated to be \$84.2 million (\$70.1 million for the front seat and \$14.1 million for the rear seat). The cost per equivalent life saved by cost-effective analysis (7% discount rate) is estimated to be \$2.39 million in front seats and \$4.71 million in rear seats. Total cost per equivalent life saved is estimated to be \$2.61 million.

This report consists of 11 chapters. I mention the purpose and method of this study as an introduction in chapter I. After that, I describe NHTSA's attitude to make 2004 final rule by accepting various research results from various sources including car manufacturers from chapter II to chapter X. On top of that, I assess the legislation impact of 2004 final rule on reducing whiplash injuries by requiring to increase the front seat head restraints and reduce the backset distance. In the end at chapter XI, I evaluated the way of NHTSA to assess the regulatory impact of 2004 final rule and suggested some helpful comments for our government and the agencies to enhance abilities in implementing legislation and legislation impact assessment. In addition, I described the contents of 2007 final rule and compared the differences from 2004 final rule in the appendix.

Key words : Head Restraints, Backset, Cost-Effective Analysis, Regulatory Impact Analysis, Regulatory Impact Assessment, Legislation Impact Assessment

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【 】

[1]	IIHS	가	80
[2]		- Kahane,1982 -	84
[3]	(Effectiveness)	-	
	700-800mm-	104

I. 서론

202 (FMVSS No. 202 Head Restraint For Passenger Vehicles, '2004) (National Highway Traffic Safety Administration, NHTSA) 2004 (Final Regulatory Impact Analysis) .

.1) NHTSA

2004 , NHTSA가 2004 , , 2004 가(가)가 . 가 . , 가가 가 . , 가 가 가

1) 가 references NHTSA , 2004 references NHTSA 가 (Supplemental Final Regulatory Evaluation) 2007 (FMVSS No. 202a Head Restraints) 2004 가(regulatory impact assessment), 가 , , 2007. 9, 34 71) . 가

I.

가 2004 . , NHTSA
(가 .)
가 NHTSA ,

가

.2)

2) NHTSA
,
가
NHTSA
(cost-effective analysis)
equivalent life saved
,
(가) (front outboard)

II. 머리지지대 설치의 필요성 등과 관련한 현행 FMVSS No. 202와 2004 최종규칙

(rear impact crashes) (whiplash injury)³⁾ (年)

272,088 .⁴⁾ 가

(low speed) ,

(torso) 가 (, biomedical community) (consensus) . ,

(head restraint)

가 ,

(rotational angle)

(脛部過度擴張, cervical hyperextension-)

202(Federal Motor Vehicle Safety Standard, FMVSS NO. 202) “ ”(Head Restraint For Passenger Vehicles) 1969 .⁵⁾

가 700mm

3)

4) 200 가 85

. http://www.kart.or.kr/

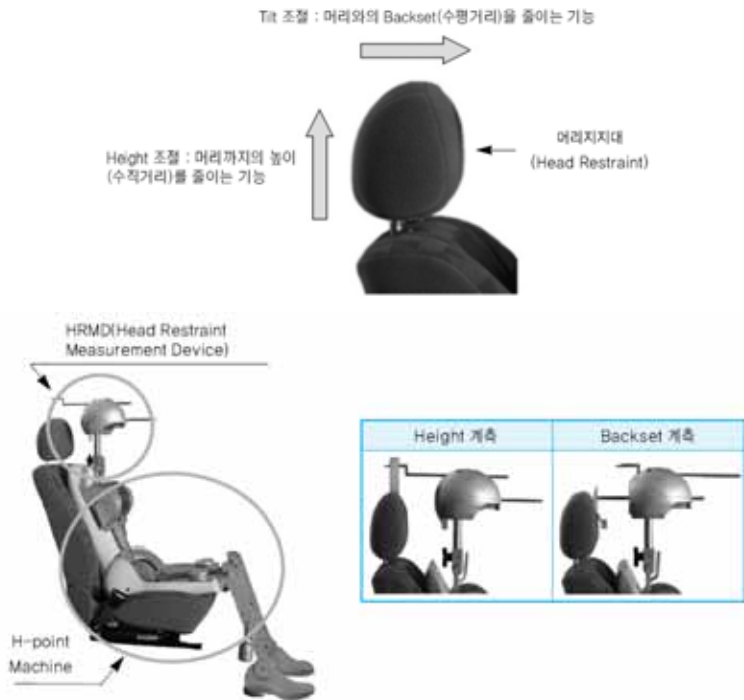
5) (passenger vehicles, PV) (passenger cars, PC), (light trucks and vans, LTVs) . LTVs pickups, vans 10,000 pounds GVWR sport utility vehicle(SUV) .

가

FMVSS No. 202
(backset)⁶⁾

6)

32-33 < 2> , 가 , , 2007. 2.,
, < 3> 가



FMVSS No. 202('2004 ,)7)

FMVSS No. 202

, . 2004 FMVSS No. 202 , 「 」 No. 17(Economic Commission for Europe Regulation NO. 17, ECE 17) “ ”(Uniform Provisions Concerning The Approval Of Vehicles With Regard To The Seats, Their Anchorages And Head Restraints(Head Rests))

가 : , ECE 17

, 2004 (adjustable head restraint) (width) (gap) , 2004 ECE 17 (adjustment retention locks)

7) 2004 12 14 , 8 2007 NHTSA Office of Regulatory Analysis and Evaluation - National Center for Statistics and Analysis가 2004 11 2004 (final regulatory impact analysis) 가 2007 4 2007 (supplemental final regulatory evaluation) 2004 2007 : 2007 2009 9 1 , 2010 9 1 . 8 55mm , (2004 25) 가 25 55mm 2007 가 , 2004 2007 (Global Technical Regulation, GTR) 가 , 2004 2007 가

가 , 2004 ECE 17 (optimal dynamic test)⁸⁾ .⁹⁾

8) 가 가(static evaluation) 가(dynamic evaluation)

(geometric test) (Good), (Acceptable), (Marginal), (Poor) 가 가 가

(sled test) 가 가 4 가

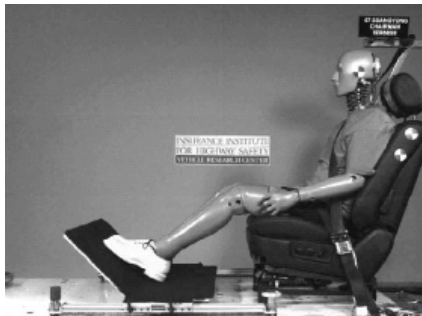
가 가 2), 33 가

가 가

가 가

Head Restraint 가. Automobile

Insurance 7-12 . <http://www.kidi.or.kr>.



9) 2004 가 NHTSA GTR

ment , WP 29 2004 11 1998 Global Agree-

, NHTSA ment

, WP 29 2005 3 Working Party of Experts(GRSP)

2005 2 GRSP GTR

(working group) . working group , , ,

Ⅲ. 2004 최종규칙 제정의 배경

1.

1969 1 FMVSS No. 202 . FMVSS No. 202 1991 8 31 (light truck)¹⁰⁾ 가 가 :

(1) 8g 가 (head reference line) (torso reference line) 45

(2) (seating reference point) 700 mm (27.5 inches) , 373 Nm (3,300 inch-pound) 가 , 100 mm (4 inches) 가 (seat-back)가 , 890 N (200 pound) 가

EC, CLEPA, OICA 8 가 . GTR , working group ECE Regulations Nos. 17, 25 2004 : GTR 3,500 kg 4,500 kg , H-point 가 R-point 가 가 (dynamic test) . working group GTR 4 Progress Reports , Docket No. NHTSA -2-4-14395 , NHTSA(Office of Regulatory Analysis and Evaluation-National Center for Statistics and Analysis), FMVSS No. 202a Head Restraints, 3-4, April 2007 .

10) 4,000 (1,815 kg)

III. 2004

가 ,11)

65mm (2.56 inches)

635 mm

(bench seats) 254mm (10 inches) , (indi-

vidual seats) 171mm (6.75 inches) .

(Department of Transportation, DOT)

(National Highway Traffic Safety Administration, NHTSA) 1982

가 ,12) 가

11) 가 , 가
4 , FMVSS 202a 가
2006 , 1145-1150 .

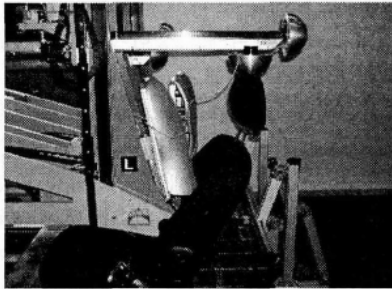


Photo. 1 Height retention test 1

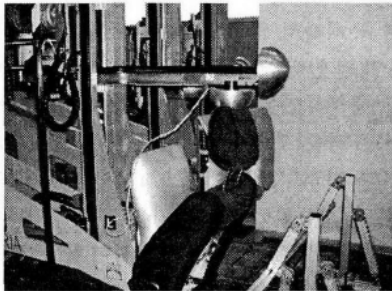


Photo. 2 Height retention test 2

12) Kahane, C., An Evaluation of Head Restraints, Federal Motor Vehicle Safety Standard 202, NHTSA, February 1982, DOT HS-808-108, pg 46. ▣

▣(Insurance Institute For Highway Safety, IIHS)

, 1995

NHTSA , (adjustable head restraints)
가 10% , (integral head re-
straints) 가 17%
750 mm (27.5 inches)

.
1982 가
가
1982 가가

,
.13) 1979 NASS(National Automotive Sampling System)
가
NHTSA가

.
60% . ,

(geometry test) 가 , 1995 가
3% , 2003 45%
가 가
2005 가 가 가(New Car
Assessment Program, NCAP) 가 가 가
4 , 가
2005 , 1580 .
13) 가 86

. NHTSA(Office of Regulatory Analysis and Evaluation), FMVSS No. 202 Head Restraints For Passenger Vehicles 4, November, 2004.

III. 2004

60% 17% 28.3% (17/0.6)
 가 , 60%
 10% 16.7% (10/0.6)
 가 . ,
 가 .

2. (Notice of Proposed Rule Making, NPRM)

2004 48 가 .¹⁴⁾
 FMVSS No. 202 ,
 FMVSS No. 202 (upgrade)
 . ECE
 FMVSS No. 202가 .
 , , (gap limits),
 .

2004
 r (Advocates for Highway and Auto Safety, AHAS)¹⁵⁾ , 가 NHTSA . , AHAS

가 . FMVSS No. 202

14) : (1), (9), (2), (2), (4), (1), (1), (1), (2), (2), (1), 가(6), (1).
 (1), (1), (2), (1), (1).

15) , . <http://www.saferoads.org>.

2. (Notice of Proposed Rule Making, NPRM)

2004

, IIHS ,

FMVSS No. 202

가

IV. 2004 최종규칙의 내용

2004 , 가 가
 , 700mm 27.5 inches
 750 mm 29.5 inches가
 . 2004 800mm 31.3 inches가
 ,
 가 가
 . 750 mm 800 mm
 55 mm 2.2 inches
 .16)
 2004 . ,
 ,
 750 mm
 (strength), (retention),
 .

16) 2004 NHTSA 55 mm
 65, 70, 80, 90 mm 가 (Alliance
 Automobile Manufacturer, AAM) 55 mm
 (potential safety disbenefits) . 25
 55 mm
 AAM , AAM 80 mm가
 . DaimlerChrysler 55 mm
 .
 DaimlerChrysler
 . Johnson Controls 90 mm가
 . NHTSA(Office of Regulatory Analysis and Evaluation-National
 Center for Statistics and Analysis), FMVSS No. 202a Head Restraints 6, April 2007.

1.

2004

. , NHTSA 가

J826 17) 700 mm

가 (

) NHTSA

(cost effectiveness)

, 700 mm (top) 가

- 가 가 NHTSA

17) SAE J826 H-point Manikin

1960

가

가

1995

1999

H-point manekin

, Matthew P. Reed, et.al, Modeling Vehicle Occupant Head and Head Restraint Positions 31-32 (UMTRI-2001-8, April 2001).



1.

.18) ,

. 가,

(700 mm

) . 가

. ()

700 mm

.

, 700 mm

가

가 (rearward visibility)가 . ,

가 700 mm

.

2004 / (United Nations/Economics Commission for Europe, UN/ECE)

, 가 가

, . 가 ,

가 ECE

. , 2004

(amount) , ECE 17 . 2004

18) 12 1999 (9 , 1 , 2 SUV)

. 12 가 5

가 . NHTSA(Office of Regulatory Analysis and Evaluation), FMVSS No. 202 Head Restraints For Passenger Vehicles 7 n.2 (November, 2004).

ECE

, 2004

ECE

가

, 2004

ECE

25 mm

(allowance,

)

(area)

(roof-line)

(roof)

(non-use position)

, ECE 17

가 “

(clearly recogni-

zable to the occupant)”

가

가

가

가

, 2004

“

”

(performance requirements)

, ECE 17

가 가

가 25 mm

60 mm

1.

ECE 17

가 pendulum impactor
, 2004 가
(energy absorption test) linear test¹⁹⁾

2004 FMVSS No. 202

가

가 가

:

(width)

Hybrid III 20)

가 가

19)

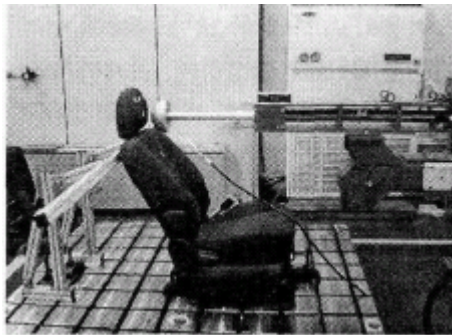
가

가

linear impactor

. <http://ko.delphi.com/enko/manufacturers/auto/other/testing/>

safetytesting/.



20)

Male Hybrid III's Family)

가 (The Original 50th Percentile

IV. 2004

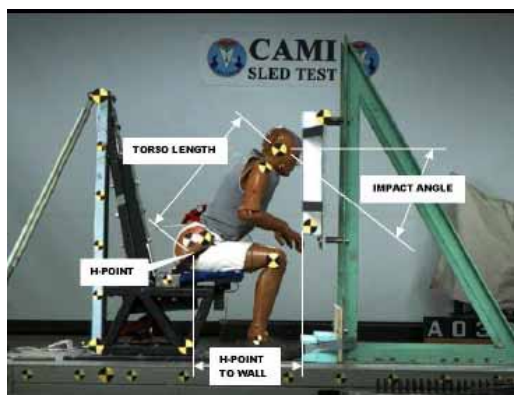
(head-to-torso) 12
(Head Injury Criterion, HIC)²¹⁾ 500

2.

FMVSS No. 202 가
700 mm(27.5 inches)
가
2004 H-point²²⁾ 800mm

21) HIC

:
깊 깊 깊 깊 깊 강 깊 강
t1 t2 15 ().
NHTSA , 1000
, HIC가 1000 18%
, 18% 55%
, 90% HIC



22) H-point(or hip-point)

H-point

2.

(31.5 inches) , 가

H-point 750mm

800mm(31.5 inches)가 ,

800mm(31.5 inches) 가 ,

750mm(27.5 inches) .

가

가

(center of gravity,

CG)

, AHAS ,

800mm 가

750mm NPRM

NHTSA가 가 가

H-point (dummy, ‘ ’)
(50th percentile male occupant)

H-point 가

The Wall Street Journal “H-point가

, SUVs H-points 가 .”



IV. 2004

800mm

가

25mm

ECE

가

, FMVSS NO. 202

H-Point

(roof-line)

가 750mm

(Insurance Corporation Of British Columbia,
ICBC) Biokinetics and Association Ltd.

가

(General Motors North America, GM),

(Alliance Auto-

mobile Manufacturer, AAM) NHTSA/

3.

NPRM , NHTSA

50mm(2 inches)

가

750mm 800mm

(biomechanics community)

가

가

(zero) 가

AAM ,

가

, AAM

(University Of Michigan Transport Research

Institute, UMTRI) ,

50mm

13%

가

25mm

(hair margin,

)

33%

UMTRI

가

. UMTRI

91mm

99%가

NHTSA가 50mm

(seatback angle)²³⁾

22

가

가

25

가

GM

50mm

23) H-point Torso Line

IV. 2004

Ford 가
 , 가 가
 .24)
 (The Association Of International Automobile
 Manufacture, Inc., AIAM) 64mm . Ford GM
 80mm 가 . Ford
 70mm 가
 가
 Daimler 50mm
 .25)
 , ICBC Transport Canada 50mm .
 50mm ,
 50mm가 ICBC
 . ICBC 2001 ,
 19 164 49 가 50mm
 .
 NPRM 50mm
 NHTSA . UMTRI가
 , 25

24) , (torso angle)가 25

, IIHS가 25
 . NHTSA(Office of Regulatory Analysis and Evaluation-National Center for
 Statistics and Analysis), FMVSS No. 202a Head Restraints, 7, April 2007 .

25) DaimlerChrysler 55mm 25 NHTSA가
 . 25

, 25 “
 (design torso angle)” “ (design seatback angle)” NHTSA
 가 . 1995-2000 가
 566 23.8 . NHTSA(Office of Regulatory
 Analysis and Evaluation-National Center for Statistics and Analysis), FMVSS No. 202a
 Head Restraints, 7 & Table III-1, April 2007 .

가 (edge)

, 25 가 . , UMTRI . 25

ICBC, IIHS RCAR

ECE 17

. NHTSA 가 가 25 IIHS
가

50mm

50mm

ICBC

, 50mm

. ,
(value)
Tenser

50mm

25

가

가 . 50mm

. , ICBC가 , 2001

164 가 49 가 50mm

, 50th Hybrid III NHTSA

가

750mm

800mm

가 0 50mm ,

가

가 50mm 100mm

20 . , NHTSA 50mm

IV. 2004

800mm (750mm)
 가 .
 , NHTSA (Vehicle Research and Test Center, VRTC) (measurement variability)
 가 +/- 5mm
 .26) Honda +/- 5mm +/-8mm
 , 55mm 가
 , 가 (50mm
 가) NHTSA .

4.

가

가

26) 2004 +/- 5mm 가 가
 . (Ford) 2004 가 가
 가 2004 .
 2007 가 GTR ,
 , 98% 2.3mm 9.5mm
 가 . NHTSA 가
 가
 . NHTSA 98% 5.6mm . NHTSA(Office of Regulatory Analysis and Evaluation-National Center for Statistics and Analysis), FMVSS No. 202a Head Restraints, 9, April 2007 .

4.

가

가

(Technical Report)

가

(head

restraint locking mechanism)

가

NHTSA

2004

가

가

800mm(31.5 inches)

가

800mm(31.5 inches)

()

(outboard-seating positions)

가

()

750mm(29.5 inches)

가

750mm(29.5 inches)

()

55mm

가 (rearward)

750mm 800mm

가

()

NHTSA

, NHTSA

가

가

가

500N

(56.2 lbs)

가

가

373Nm(3,300 inch lb)

가

가

13mm

가

가

가

5.

1949

. UN

The Geneva Convention on Road and Signs가

, UN

(Economic Commission for Europe,

ECE)

가

. Geneva Convention ,

가

가

Geneva Convention

가 가

가

가

가

가 , ECE
 가
 . ECE FMVSS No. 202
 (regulations) 가 , ECE 17 ECE
 25가 . ECE 17 , ,
 , ECE 25 가
 .
 ECE 17
 2004 가
 . 2004 254mm(10 inches)
 , ECE 17 170mm(6.7 inches)
 . 2004 가
 ECE 17 ,
 2004

(1)

NHTSA 가
 170mm , 254mm
 . 170mm
 ECE 17 . NHTSA ECE 17
 170mm
 .

(2)

가

2004

ECE 17

, ECE 17

60mm(2.36 inches)

가

가

가

가

25mm(0.98 inches)

60mm(2.36 inches)

. NHTSA

ECE

가

ECE 25

가

가 가

, NHTSA

60mm

, ECE

. ECE

가

가 가

25mm(0.98 inches)

, ECE

, 2004

6. 가 ()

, 가
가

60mm(2.36 inches)

GM 2004

ECE 17

. Daimler

가

NHTSA가

AHAS

(rulemaking record)

AHAS

6. 가 ()

가

가

가

가

.27)

690mm ,

27)

. NHTSA(Office of Regulatory Analysis and Evaluation), FMVSS NO. 202 Head Restraints For Passenger Vehicles 17, November, 2004.

726mm (5-3). ,
50% 50%

가 2004 가 가

가 750mm(29.5 inches)
(가 47%)

가 ,

· , ,

·

, ·

, 가

가 (rearview mi-

rror) 가

· NHTSA 가 가

· 가 가

(rear outboard seating positions)

가 ·

가

NHTSA ·

가

7.

. 2004

가

NHTSA 775mm(29.5 inches)

1999

Toyota Camry

가

가

(exterior mirror)

가

가

가

가

가

가

가

가

7.

2004

2008 9 1 (2004

9 1

IV. 2004

3) 가 NPRM .
, ECE 17 FMVSS No. 202
(2004
11 2004 4)
. Honda 2004
3
가 . Porsche 가
가 ,
,

V. 2004 최종규칙 제정을 위한 후면추돌시 발생하는 목부상과 관련된 연구조사

1993 28) , 가
가
(stiffness)가
가 (displacement)

1987 1988 Volvo 26
(33) 29)가

가 (Abbreviated Injury Scale, AIS)³⁰⁾ 1 70%

28) Mats Y. Svensson, Per Lovsund, Yngve Haland and Stefan Larson, The Influence of Seat-Back and Head-Neck Motion During Rear-Impact presented at the 1993 International IRCOBI Conference on the Biomechanics of Impact, 8-10 September, Eindhoven, The Netherlands.

29) Olsson I, Bunketrp O, Gustafsson C, Planath I, Norin H, Y Sander L, An In-Depth Study of Neck-Injuries in Rear End Collisions, 1990 International Conference on The Biomechanics of Impact.

30) 가 AIS .
(Association for the Advancement of Automotive Medicine, AAAM)
, AIS AIS 0 AIS 6 . Paul G. Bedewi and Nabih E. Bedewi Modeling of Occupant Biomechanics with Emphasis on the Analysis of Lower Extremity Injuries, FHWA/NHTSA National Crash Analysis Center, The George Washington University, Ashburn, Virginia USA.

100mm

가

가 (neck injury criterion, NIC) (cervical spine) 가
 가 가 가

가
 가

.31)

가 NIC 15%

NIC

AIS (Code)	(Injury Level)	(Fatality Range)
0	No Injury	0 %
1	Minor	0 %
2	Moderate	0.1 - 0.4 %
3	Serious	0.8 - 2.1 %
4	Severe	7.9 - 10.6 %
5	Critical	53.1 - 58.4 %
6	Maximum	Virtually Unsurvivable

31) Wheeler JB, Smith TA, Siegmund GP, Brault JR, King DJ. Validation of The Neck Injury Criterion(NIC) Using Kinematic and Clinical Results From Human Subjects in Rear-End Collision. IRCOBI Conference 1998. NIC

NIC

* $NIC = 0.2 \times \text{rel}(\text{neck}) + \text{rel}(\text{cervical spine})$ 가

* NIC 20%
 50%

1.

33%가 (42 22) 4갈갡 갡 8갈갡 갡
 가 NIC가 NIC가 (dorsal root ganglion pathology)
 (pressure gradient injury mechanism model)

(histopathological examination) 가
 가, (nerve) (post-impact)
 , NIC
 NIC

1.

5-1 가 가 1999 14 (proposal)
 (measurements) . 2004
 , 2004 , 800mm(31.5 inches)
 , 750mm(29.5 inches) , 55mm
 (2.17 inches) ,
 , 1999 Toyota Camry

V. 2004

781mm(30.75 inches) 0.75 inches
 0.19 inches
 , 2004

5-1

: inch

Toyota Camry*	0.75	0	0.75	0	0	0.19	0	0.39
Honda Accord	1025	0.78	1.75	0.78	2.75	+	2.75	+
Taurus/Sable	3.0	1.37	3.25	0.09	4.5	1.87	6.25	1.87
Chevy C1500/GMC	0.25	0	0.5	0
Chevy S-10	0.25	0	0.25	0
Neon	0	2.36	1.0	0.78	3.0	+	3.5	+
Saab 9-5	0.25	0	0.25	0	0	0	0	0
Lumina	1.0	0.59	1.25	0.49	5.5	+	5.25	+
Grand Cherokee*	2.75	1.77	3.25	0	1.37	2.75	1.37	2.75
Chevy. Cavalier	1.37	1.28	1.25	1.08	2.12	2.16	2.75	2.55
Malibu	0.75	0	1.0	0	5.0	+	4.0	+
Cadillac	0	1.89	1.75	2.36	4.12	4.13	4.75	+
Caravan*	0.5	0.39	1.75	0.33	2.0	1.37	1.75	1.37
Explorer*	2.62	2.95	2.5	3.15	0	1.08	1.5	1.82

* : * 가

, *
 가 .

+ : ICBC 가

: , 6
 positive locking mechanism
 , 6
 locking mechanism , 3
 positive locking mechanism , 3

1.

가 5-2, 5-3, 5-4 .
2004 가

5-2 2004 (가
가)

: inch

	1.2	3.9
	1.4	1.0
	1.3	2.6

5-3 2004 ()
(가 가)

: inch

	-8	3.9
	1.5	3.7
	0.9	3.8

5-4 2004 (가
가)

: inch

50mm	0.9	1.8
55mm	0.7	1.6

2.

1982 가 , 62%
 . 1988 1996
 38%
 NASS-CDS Report ,
 77% 23%
 . NHTSA 47% 1998
 , 93% ,
 7% . ,
 .
 (light truck)
 가 . 1988
 1996 NASS-CDS Report ,
 23%가 77%가 . 72%
 1998 , 20%
 , 80%가 .
 1998 , 가
 8 15 , 7 4
 (1 5 5 5), 9 5 (58%)가
 가 , 6 4 9 (42%)가
 .
 NHTSA 가
 .
 .
 ,
 ,

3. (Active Head Restraints, AHR)

가

3. (Active Head Restraints, AHR)³²⁾

5-5 Viano (rear impact sled test) ³³⁾ Saab NHTSA

34) Viano

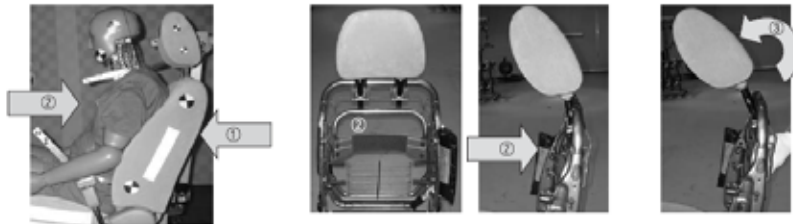
32) 가

()

가

가

, 2007, 2, 34



33) Viano, et al

34) Saab Active Head Restraint(SAHR)

SAHR

가

가

KIDI,

Head Restraint

, 2007. 8. 14. IIHS 1999

AHR

1999 Saab 9-5

가 , 2000
 AHR 가
 가
 NHTSA FMVSS 301 2003
 Hybrid III percentile male
 (up), (mid), (down)
 가
 5-5 5-5 4
 가
 가 가 (Head-to-torso ro-
 tation degree) 가 FMVSS
 No. 202 (△) 17.2
 4.6 6.5
 5.6 2004

가 가
 Head Restraint 가, Automobile Insurance 7-12 . http://
 www.kart.or.kr.



3. (Active Head Restraints, AHR)

12, 12 46%(5.6/12)
 5-5 가
 83%(10/12)
 23.5갹갹 갹
 17.2갹갹 갹
 2004

5-5

Test Type		△갹갹	mm		HIC		Source
Sled	Saab9-5+SAHR	12.8	35	up	11	1	Table4 in Ref. 1
Sled	Saab9-3 SAHR	16	41-43	up		4.6-6.5	Table14.2 in Ref. 2
Vehicle	Saab9-3 2003MY	25	26	up	75.1	8	NHTSA FMVSS 301 TEST
Sled	Saab9-5+SAHR	30	35	up	39	11	Table4 in Ref. 1
Sled	Saab9-3 SAHR	23.5	46	mid	35	10	Table14.2 in Ref. 2
Sled	Saab9-3 SAHR	16	48-65	down		13.3-16	Table14.2 in Ref. 2

- Reference 1: Viano, D., Olsen “The Effectiveness of Active Head Restraint in Preventing Whiplash”, Journal of Trauma, Injury, and Critical Care, Vol. 51, No. 5, 2001.
- Reference 2: Viano, D., “Role of The Seat Crash Safety”, Society of Automotive Engineers Inc., Warrendale, PA, 2002.

VI. 머리지지대 설치로 인한 편익(목부상 감소 건수)

1. 35)

NHTSA 1988 1996 ,
 (Van) 805,851 가
 . ,
 , 가 , ,
 , , ,
 9,994 80
 . NHTSA , ,
 가 , 27
 270,861 .

1988 1996 NASS-CDS(National
 Automotive Sampling System-Crashworthiness Data System)
 ,
 AIS 1 70,307 .
 가 ,
 (6-1(a)).
 ,
 가 ,

35) 2007 가 2004 가 . NHTSA
 (Office of Regulatory Analysis and Evaluation-National Center for Statistics and Analysis), FMVSS No. 202a Head Restraints, 13-20, April 2007 .

VI. ()

.
가
1988 NASS-CDS . ,
NHTSA

가 (1997, State Data
File) (1996, State Data File) .

가 2,840 (),
5,815 가 .

5,815 ,
. , 5,815 가
. ,

$3.05[(5,815+2,840)/2,840]$ 가 .

2,074 , 4,096 가
. 4,096 ,
가 . , 4,096

가 . ,
 $2.97[(4,096+2,074)/2,074]$
가

, 3.0 . ,
 $210,921(70,307 \times 3)$.36)

36) 가

2,840 5,815 가 ,
가
(multiplier) 3.05 가 . 2,074 4,096

1.

NHTSA 37) , 가
 . AIS 1
 가 multiplier 1.29
 . ,
 210,921 1.29 272,088 .
 70,307 5,440
 (7.7%) . ,
 multiplier ,
 , 5440x3x1.29=21053
 5,440
 가 564 (10.4%) NASS-CDS
 .
 가
 가 1999 1998
 , 1999 41%
 가 750mm(29.5 inches)
 , 39% 가 가 , 20%
 . , 가 80%
 41%가 . ,
 가 51%()가 .

가 , . ,
 multiplier 3.05가 .
 , 3.0 . ,
 70,307 3 ×

37) The Economic Cost of Motor Crashes, 1994 NHTSA, DOT HS 808 425, July 1996, pg. 9.

1.

가 . , 1988 1996
 가 . 6-1(b)
 1999 . 251,035 (272,088-
 21,053) , 19,826
 , 270,861 .

6-1(a)
 NASS-CDS 1988-1996, Towaway Annualized Data

Car	13,291	43,355	4,323	277	61,246
Truck	3,041	1,188	4,804	28	9,061
Total	16,332	44,543	9,127	305	70,307

6-1(b) 1999

	Front Seat Outboard	Rear Seat Outboard	
	251,035	19,826	270,861

6-2
 NASS-CDS (1988-1996)

	16,331	0.27
	44,542	0.73
	60,873	1.00

VI. ()

6-2

27% , 73% .

:

: ×

: ×

30%

가

(6-3) , 가 LTVs
가

Kahne³⁸) 가 , Kahne 가 ,

가

, (

100)

가 31.75% 27.99%

. LTVs , 30.57%

30.53%

가

가

(whiplash raw column) , 50

38) Kahane, C., "An Evaluation of Head Restraints, Federal Motor Vehicle Safety Standard 202" NHTSA, February 1982, DOT HS-806-108.

1.

가

가

Kahane

가

. Kahane

635mm(25 inches),

724mm(28.5 inches)

724mm(28.5 inches)

가

711mm(28 inches),

765mm(30.1

inches)

770mm(30.3 inches)

89mm(3.5 inches)

58mm(2.3 inches)

가

가

가

가

가

5 9

(: 37.94%,

31%) LTVs

(: 17.14%,

: 20.65%)

5 10

LTVs

. LTVs

56.71%,

35.72%

VI. ()

, LTVs 30.19%, 28.04% .

가 , 가

가 : ,

가 가

17.14% 56.71% . ,

37.94% 17.14% .

1988 1996 .

6-3 (1988 1996 NASS ;)

Car	Vs	31.75 to 27.99
Truck	Vs	30.53 30.57
	Car Vs Truck	31.75 30.53
	Car Vs Truck	27.99 30.57

Car	Short	Vs	37.94 to 31.00
Car	Tall	Vs	35.72 28.04
Car		Short Vs Tall	37.94 35.72
Car		Short Vs Tall	31.00 28.04
Truck	Short	Vs	17.14 20.65
Truck	Tall	Vs	56.71 30.19
Truck		Short Vs Tall	17.14 56.71*
Truck		Short Vs Tall	20.65 30.19

	Short	Car Vs Truck	37.94 to 17.14*
	Tall	Car Vs Truck	35.72 56.71
	Short	Car Vs Truck	31.00 20.65
	Tall	Car Vs Truck	28.04 30.19

* 0.05 가

6-3(a)

가

(1988 - 1996 NASS Annualized Data in Towaway Crashes)

			가	(%)
5	9	152	8937	37.94
5	9	10	407	11.59
5	10	49	3172	35.72
5	10	2	86	44.85
Unknown		22	623	12.36
Unknown		5	65	9.54
		240	13290	31.75

VI. ()

6-3(b) 가
(1988 - 1996 NASS Annualized Data in Towaway Crashes)

			가	(%)
5	9	607	29,193	31.0
5	9	1	6	1.10
5	10	232	9,932	28.04
Unknown		111	4,224	17.17
		951	43,355	27.99

* 100 .

6-3(c) 가 LTVs
(1988 - 1996 NASS Annualized Data in Towaway Crashes)

			가	(%)
5	9	46	926	17.14
5	10	23	2058	56.71
Unknown		3	57	6.25
		72	3041	30.53

6-3(d) 가 LTVs
(1988 - 1996 NASS Annualized Data in Towaway Crashes)

			가	(%)
5	9	14	413	20.65
5	10	9	286	30.19
Unknown		6	488	52.74
		29	1187	30.57

2. IIHS 가

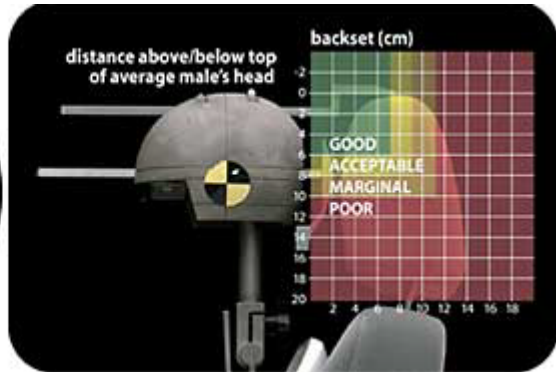
IIHS 1995, 1997, 1999, 2001, 2002, 2003

. 6-4(a) 6-4(b)
 가 가³⁹⁾ 1999 .40)

39) 가(Head Restraint Rating): 가
 가
 가 4 .

(Acceptable) 2cm
 . 4 , 가
 , 2005 , 1580-1585 .

1	7 cm	6 cm	
2	9 cm	8 cm	
3	11 cm	10 cm	
4	11 cm	10 cm	



40) IIHS 2007 4 가 , 2007 7 SUV, , 가 88

가 22, 13, 53 가 . 가 9
 22 가 13 , 9
 . , Audi A4 A6 가
 . 2005 8

SUV, , 가 83 가 22, 7, .

VI. ()

IIHS Rating

6-4(a) 가(1998)

: (number)

	Rating					
	5	21	40	94	13	173
	0	5	5	11	3	24
Utility	0	6	9	18	7	40
	0	3	0	2	0	5
	5	35	54	125	23	242

6-4(b) 가(1998)

: %

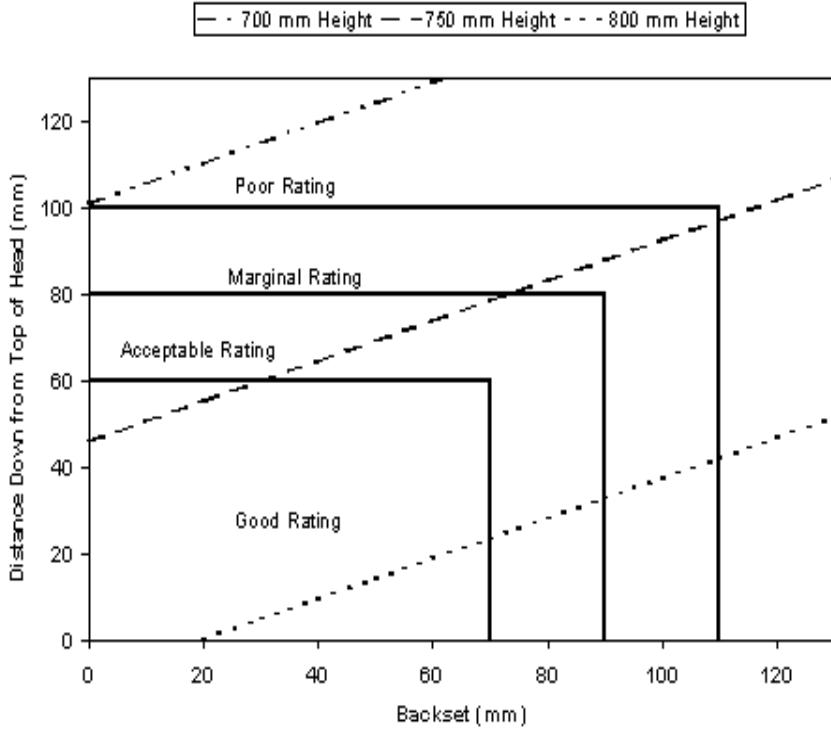
	Rating					
	2.1	8.7	16.5	38.9	5.4	71.5
	0	2.1	2.1	4.6	1.2	9.9
Utility	0	2.5	3.7	7.4	2.9	16.5
	0	1.2	0	0.8	0	2.1
	2.1	14.4	22.3	51.7	9.5	100

54 가 . 22 가
 10 , 12
 WHIPS 가
 가
 가
 가
 가
 (.
), . <http://www.kart.or.kr>

VI.

()

[1] IIHS 가



IIHS 1999

가

가가

가

6-5

6-5 가 가 (States) 41)- ,

	0.90*	0.64**	0.76**
	1.53**	0.63	0.92
	1.17	0.88	1.00

*0.90 가
 가 10% .
 **

41) (回歸分析, regression analysis)

가

. 1 1
 (Simple Regression Analysis), 1

(Multiple Regression Analysis)

, 가 ,
 가

(Residuals) 5 가 가 ,
 0 , 가 ,

(Logistics Regression Anaysis) , 가 0, 1 가

1) 가 , 2) 가

/ (binary response)

(binary response regression)

(1) P 0 1 , (odds ratio) P/(1-P) P

가 , (Maximum Likelihood) 가

VI. ()

IIHS , 800mm(31.5 inches)
50mm(2 inches)

IIHS

. IIHS ,
24%(0.76)

가

가

24%

가

, NHTSA

가 3

Volvo

가 5 , 6-5 1.53

가

가

50%

, NHTSA

가

3. NHTSA 가 42)

(1) (Passenger Cars)

Kahane 1968 1969
 . 1968 FMVSS No. 202 , 1968
 88%가 . 1969 FMVSS
 No. 202 1969 12%
 가 . , Kahane
 . Kahane
 17%, 10%
 가 .
 13.1% .
 Kahane 686mm 787mm(27 inches 31
 inches) , 9.5%
 (6-6). 9.5%
 0.60 (0.60

42) 2007 가 2004
 . , Alliance 가 , Consistent Threshold Me-
 thod . Alliance Olsson (33
 26) Consistent Threshold Method
 . , NHTSA Olsson
 (risk curves)

(Delta V, pulse shape, seatback rotation, age, gender, muscle tensing, etc) 가

(가) . NHTSA(Office of Regulatory Analysis
 and Evaluation-National Center for Statistics and Analysis), FMVSS No. 202a Head
 Restraints, 21-26, April 2007 .

VI.

()

).

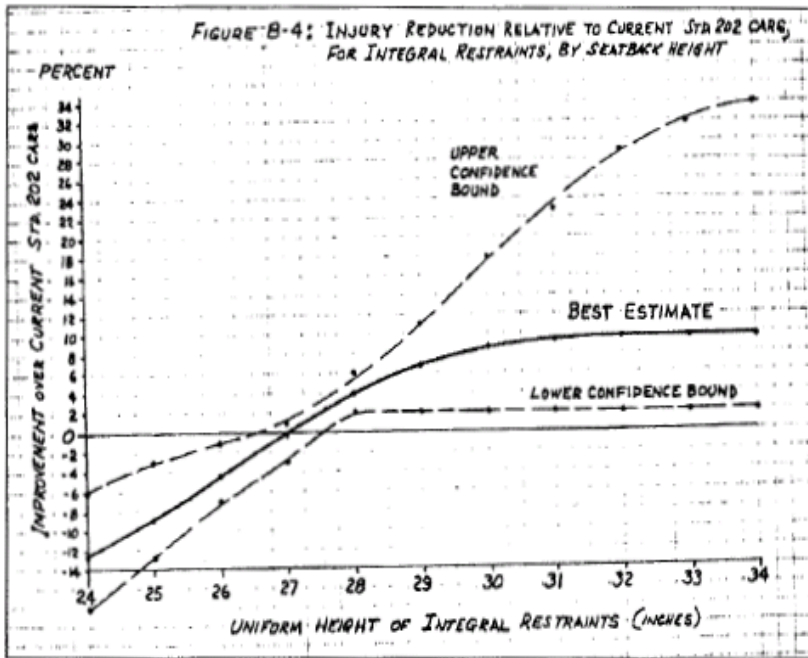
787mm

Kahane(1982)

[2]

[2]

- Kahane,1982 -



6-6

Kahane

가

Kanane

6-6 FMVSS No. 202

Improvement over current FMVSS 202 CARS			
(inch)	Confidence Bounds		
	Best Effectiveness Estimate	Lower	Upper
24	-12.4	-18	-6
25	-8.9	-13	-3
25.6*	-6.1	-10	-2.5
25.7*	-5.6	-9.5	-2
25.8*	-5.1	-8	-1.5
26	-4.2	-7	-1
27	-0.1	-3	1
27.5* (Current Standard)	2.0	0	4
28	4.0	2	6
29	6.6	2	11
29.5*	7.5	2	14
30	8.3	2	18
30.1*	8.4	2	18.5
30.2*	8.5	2	19
30.3*	8.6	2	20
31	9.4	2	23
31.5*	9.6	2	26

Source: Kahane, C., "An Evaluation of Head Restraints, Federal; Motor Vehicle Standard 202" NHTSA, February 1982, DOT HS-806-108, Pg 46

* Kahane

(2) (Light Trucks)

NHTSA 2001 43) 1993 1998
 8 (states) 가 ,

43) Walz, M. C., "The Effectiveness of Head Restraints I Light Trucks, FMVSS" NHTSA Technical Report, April 2001, DOT HS-809-247, Pg 45.

VI. ()

6.08%

Kahane FMVSS No. 202

(13.1%)

(stiffness) 가

가

() 가

6.08%

Walz

, FMVSS No. 202

1989

(6-7).

(가

) 546mm(21.5 inches)

(FMVSS No. 202

) 559mm(22 inches)

, 가

Walz

6.08%

50%

가

, Waltz

. SUV

가

3. NHTSA 가

13.1% SUV , , SUV
 13.1%가 ,
 6.08%가 .
 6-7(a) , LTVs
 62% , SUV 38% 가
 LTVs 8.72% .
 가
 LTVs

(The effectiveness adjustment factor)

6-7

	1989			가
Dodge Full Size	82642	19.3	0.046445	0.896389
Chevy Full Size	551209	23.0	0.309781	7.124961
GMC Full Size	153938	21.4	0.086514	1.85139
Ford Full Size	587911	21.0	0.330408	6.938558
Dodge Dakota	88673	19.5	0.049834	0.971772
Ford Ranger	273336	21.0	0.153616	3.225927
Chrysler Arrow (import)	41642	22.3	0.023403	0.521885
	1779351			21.53088

VI. ()

6-7(a) , ()

Car		57,158		
Car		4,089		
Oth Lt Truck		191		
Oth Lt Truck		80		
SUV		1,902	1,902	25.30%
SUV		1,094		
Van		926	926	12.32%
Van		177		
Pickup		4,689	4,689	62.38%
Pickup		0		
			7,517	100.00%

4. 가 44)

6-2

767mm(30.2 inches) , 2004 33mm(1.3 inches)
 가 ,

. 1982 Kahane 가 (6-6), 33mm(1.3 inches) 1.1%

, 2004

44) 2007 가 2004

. NHTSA(Office of Regulatory Analysis and Evaluation-National Center for Statistics and Analysis), FMVSS No. 202a Head Restraints, 26-31, April 2007 .

가
NHTSA 800mm(31.5inch)
767mm(30.2 inch)

통계 집단의 Δ 방정식은 다음과 같다

Δ 는 평균적인 남성 무게 중심까지 거리
는 방법으로 측정된 머리 지지대 높이
의 머리 위에서부터

위의 방정식에 관하여 다음 가지를 전제한다
는 머리의 윗 부분에서 Δ 는 평균적인 남성의 위치보다 Δ 는 평균적인 여성의 위치보다
머리 지지대의 높이는 높이 위에 위치하면 탑승자를 보호하기에 충분하다

가 , 25

(Δ)

(CG) 746mm 687mm

700mm(27.5 inches)

(Δ) (CG)

80mm

가 , 가 800mm(31.5 inches) Δ

CG 133mm(5.2 inches)

, 750mm(29.5 inches) Δ

125mm(4.9 inches)

VI.	()		
	55mm(2.2 inches)	,	
767.7mm(30.2 inches)	깊넓관깊강관관깊갱정E1강강강관		가
	55mm		
767.7mm	95%		
NHTSA	(
) ⁴⁵⁾	2004		
	()		
	6-8a	6-8b	
	2004		
		75mm	
FMVSS No. 202		700mm(27.5inch)	
(75mm)	25%	87%	
. 2004		(800mm, 31.5inch)	
(55mm)	99.7%	100%	
91%	100%		
2004		9%	
		NASS CDS(1988-1996)	
	NHTSA 13		
65.8inches	700mm	55mm 67inches	
	750mm	55mm 74inches	

45) “ (covered)” , 가 (top) CG
 , CG

. NHTSA(Office of Regulatory Analysis and Evaluation), FMVSS No. 202 Head Restraints For Passenger Vehicles 45 (November, 2004).

. 55mm , 66inches
 60% . 750mm
 97% .

6-8(a) Percent of Adult Male()

Requirement	Covered By Height alone(Backset=75mm)	Covered By Height and Backset(Backset=55mm)
Current FMVSS 202 =700mm	16.08%	25.0%
=767mm	90.8%	94.7%
2004 =800mm	99.3%	99.7%

6-8(b) Percent of Adult Female()

Requirement	Covered By Height alone(Backset=75mm)	Covered By Height and Backset(Backset=55mm)
Current FMVSS 202 =700mm	80.3%	86.9%
=767mm	99.9%	100%
2004 =800mm	100%	100%

282 , NHTSA

, 47%
 , 51%

2% . , 2%

VI. () (equal distribution) 가 . 가 : , 가 (CG) 가 . , 가 . , 가 52%가 . 46) 711mm(28.0inches) . 2004 750mm(29.5inches) . Kahane 가 , 711mm 750mm 3.5% 가 . 가 , 가 . 5.83% 48% . 가 , . Kahane 가 559mm (22 inches) . 가

46) (the lowest height) 가 . NHTSA(Office of Regulatory Analysis and Evaluation), FMVSS No. 202 Head Restraints For Passenger Vehicles 47 (November, 2004).

4. 가

648mm(25.5 inches) .

711mm(28 inches) .

1999 14 , 711mm .
1970 64mm(2.5 inches)
가 .
559mm

668mm(26.3
inches) . , Kahane 가 , 668mm 750mm
10.47%

가 , 가 .
2004
가 . 가

653mm(25.7 inches) ,
2004 750mm(29.5 inches) 97mm
(3.8 inches) . ,

655mm , 가
650mm(25.6 inches) . , ()
가) 653mm(25.7 inches)
. Kahane , 653mm 750mm
13.1% 가

, 가 . ,

VI. ()

(NASS 1988-1996)

	5 9	5 10	
	66%	34%	100%
	83%	17%	100%

5.

가 , FMVSS No.

202

, 가

. NHTSA

가가

. NHTSA

(proposal) 가

() 가

.

가

. , NHTSA

가

(2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029 2030)

4 가

IIHS

. NHTSA

VI.

()

Δ (km/h)	Impact Pulse	Seatback Rotation (deg)		(cm)	Aware	*Backset (cm)	*Height (cm)	
13	stiff	0	23	183	no	8	14	0-7
16	stiff	0	51	179	no	5	8	0-7
12	stiff	11-15	49	185	no	6	12	0-7
12	stiff	1-10	38	186	no	6	10	0-7
19	stiff	11-15	47	181	no	10	10	0
19	stiff	0	22	186	no	18	17	>12
17	stiff	0	51	173	no	16	6	>12
13	stiff	1-10	34	172	yes	9	5	7-30
5	stiff	0	36	189	no	17	7	>12
19	stiff	1-10	62	179	no	12	13	>12
19	stiff	11-15	61	173	yes	10	6	4-11
19	stiff	0	59	167	no	0	4	7-30
24	soft	11-15	42	176	yes	9	10	>12
22	stiff	1-10	34	163	no	4	4	7-30
27	stiff	>15	60	176	no	6	13	7-30
27	stiff	>15	59	164	no	10	3	1-3
9	soft	0	50	171	no	6	6	0-7
24	stiff	0	77	168	no	8	5	0-7
30	soft	0	19	184	no	9	13	0-7
30	soft	0	20	187	no	10	15	>12
11	stiff	0	46	182	no	10	12	>12
9	stiff	0	36	176	no	7	10	7-30
18	stiff	1-10	36	194	yes	7	20	0-7
9	stiff	0	54	156	yes	5	1	0
9	stiff	0	86	153	no	5	3	>12
9	stiff	0	41	188	no	6	9	0-7
15	stiff	0	49	172	yes	3	11	0-7
18	stiff	11-15	28	175	no	8	11	>12
16	stiff	1-10	64	177	no			>12
16	stiff	1-10	61	164	no			0

* Height

* Backset

Viano et al.⁴⁸⁾ Saab

가

가(peer review)

± 값 , 가 (△) ± 값

4 가 . 1) (2), 2)

(3), 3) 10 (4), 4) 10

6-10 Saab 900 Saab 9-3

. Saab 9-3 (Saab Active

Head Restraint, SAHR) , Saab 900

. Saab 900

30mm . Saab 9-3

SAHR .

, 가 . Saab

(high position) 760mm .

Saab 900 Saab 9-3 가 ,

Viano Saab 것강값강 값 값 값 값 값 값 값 값 값 값

12.5 km/h . Saab 900

6 Saab 9-3 .

48) Viano, D.C., et al, The Effectiveness of Active Head Restraint in Preventing Whiplash, Journal of Trauma, Volume 51, Number 5, pp 959 - 969, 2001.

VI. ()

6-10 Saab

		/ (%)		()
Saab 900	48	14.6%	30-50	6
Saab 9-3	38	5.2%	NA	0
		9.4%		
		64%		

Saab 900 Saab 9-3
 ()
 . Saab 9-3 Saab 900
 가 (stiffness)가 . ,
 Saab 9-3 ,

IIHS Farmer, Wells, and Lund⁴⁹⁾
 (redesigned) / 가 가

가 ,
 ,
 43%

49) Farmer, Charles, Wells, JoAnn, Lund, Adrian, "Effects of Head Restraints and Seat Redesign on Neck Injuries Risk in Rear-End Crashes", Insurance Institute For Highway Safety, October 2002.

18% 가
 IIHS
 (,)
 (,)
 . 2000 (Ford Taurus)
 가 가

6-11A IIHS Taurus Data(October Status Report)

		Down	Up	Down	Up
1999 Taurus	No	120*	95	175	130
1999 Taurus	No	125	85	165	125
2000 Taurus	Yes	65	70	80	30
		57.5	20	90	97.5

* 가 (Assumed)

- IIHS (mm)

6-11B IIHS NHTSA (mm)

		Down	Up	Down	Up
1999 Taurus	No		95	684	714
1999 Taurus	No	125	85	695	714
2000 Taurus	Yes	65	70	747	794

VI. ()

6-12

(Yoganandan, 2002)

	750mm	800mm
0 mm	0 deg	1 deg
50 mm	19 deg	16 deg
100 mm	40 deg	41 deg

: 0 mm, 50 mm, 100 mm, 750mm, 800mm

Siegmund(1999) Yoganandan(2002) (kinetics)

- 1) , 2)
- , 3) 1),
- 2), 3)

. Lundell, et al. (1998) Volvo (Whiplash Injury Protection System, WHIPS)⁵³⁾ 가

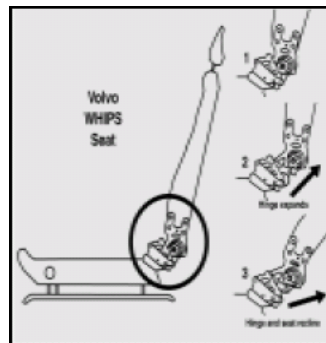
53) Volvo WHIPS 가 가 . 가 가 . KIDI, Head Restraint , 2007. 8.14.

6.

가
가, SAHR (Viano, 2000)

6. 54)

가 가 가
가 700mm 800mm



54) 2007 가 2004

, 2007 가
가 (4-9). NHTSA(Office of Regulatory Analysis and Evaluation-National Center for Statistics and Analysis), FMVSS No. 202a Head Restraints, 32-34, April 2007

4-9

55mm	3.5	5.83
60mm	2.5	4.17
61mm	2.3	3.83
65mm	1.7	2.83

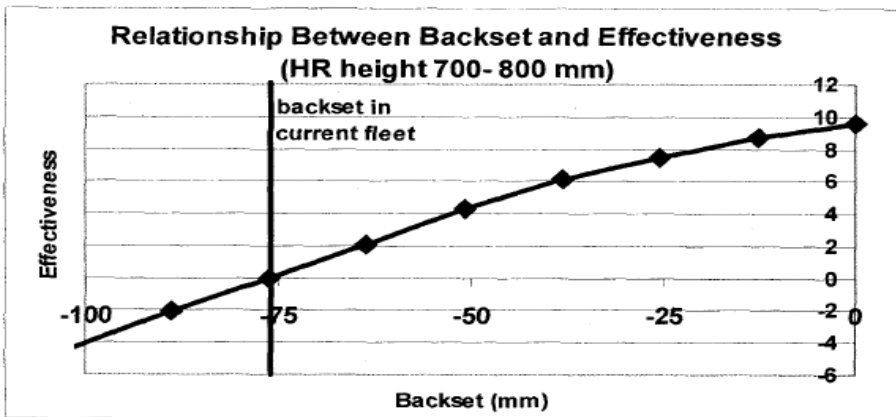
VI. ()

(100mm 0mm) 650mm 750mm
가 . [2]
, 가 가 660mm(26
inches) 787mm(31 inches) , 787mm
가

[3] (0)

가 700mm
가
75mm . 75mm
0 가 . 가
가 0 , 10%
[3]

[3] (Effectiveness)
700-800mm-



6.

767mm 75mm

. 2004

800mm 55mm

. [2] [3]

767mm 800mm

가 1.68% 3.5% 가 . , [

3] 가 75mm 55mm

가 75mm 55m

3.5% 가 .

3.5%

가

가 .

121mm

650mm .

4가 가 ,

. NHTSA 4가 .

1: 700mm

750mm

2: 750mm

3: ECE 17/25 , 700mm

750mm

4: 700mm

1 97.6mm

668mm .

2 3 10.47%

7.5% .

VI. ()

10.47%

1 668mm 750mm 가 668mm 가 10.47% 가 , 가 6-13

6-13

	(A)	(B)	Max[A, B]
:	1.68	5.83	5.83
: Up	1.68	5.83	5.83
: Down	5.83	5.83	5.83
1	17.45	7.5	17.45
2	20.92	6.0	20.92
2 : Up	3.41	12.17	12.17
2 : Down	21.0	12.17	21.0
3	17.45	7.5	17.45
4	19.63	12.83	19.63

가

	7.	가	
가		가	가
	.	,	
	가	.	
	가		가
NHTSA	.		
	7.	가	
			251,035
,		가	67,779
	가		183,256
,			
	.	,	6-13
			가
가 5.83%	.		
	가	(potential injuries)	
	,	가	
	.		

겠
 겠간
 는 머리지지대를 하지 않았을 때의 겠겠간갠겠겠갠갠 갠갠겠갠갠갠갠 갠갠갠갠갠갠갠
 겠는 현재 총 목부상건수
 겠 머리지지대가 있을 때의 목부상이 발생하는 차량의 비율
 간 현재 머리지지대 시스템의 갠갠갠갠갠갠갠갠갠갠갠갠갠갠갠갠

앞좌석의 고정식 머리지지대 경우

겠
 ×

앞좌석 조정식 머리지지대의 경우

겠
 ×

그러므로 앞좌석의 겠겠간갠겠갠갠갠갠갠 갠갠갠갠갠갠갠갠

VI. ()

, 가 31.5inches 55mm ×

8 (0.471) 9 (0.529) (1 7) 가

, × × ×

.55)

21,429

, SUV

LTV

, NHTSA

가 700mm

가 700mm 가

가

가

(6-3).

(6-3).

55) 2007
4

가
, 2004

1

VI. ()

× × × ×

: ,

(52%)

(48%)

700mm

가

가

가

: × × ×

×

: × × ×

×

: × × × ×

: × × × ×

1,172

가 .

7. 가

× × ×

.
× × ×

2,988

가 .

,

.

,

가 .

3: 12866 §6(a)(3)(C) (UMRA)
§205 (rule)

2004

FMVSS No. 202

가 가 . 2004

, 가

2004 ECE 17/25

.⁵⁶⁾ ECE 17/25 , ,

가 800mm (800mm),

56) , , . NHTSA(Office of Regulatory Analysis and Evaluation), FMVSS No. 202 Head Restraints For Passenger Vehicles 66, November, 2004.

VI. ()
 가 750mm (750mm) .
 , 가 800mm
 , 750mm (use positions)
 가 가
 , 750mm 750mm
 (use positions) 가
 .
 2004 H-point
 800mm 가
 , 가
 , H-point
 750mm .
 H-point 800mm ,
 H-Point
 750mm 가 .
 6-13
 52% 48%
 (breakout) .
 가 :
 × × ×
 가 :
 × × ×
 : × ×
 :
 50% ,

7. 가

×

8,050

586 .

586 .

1,171

ECE

9,222

4:

가 700mm

700mm

:

:

× × ×

:

× × ×

0.1963

1,051

VI. ()

8.

9,994 57) ,
 270,861 , 27 (2002
 ; 2005 30 5).
 9,994 6,843 (2002 ; 2005
 7,729)
 3,151 (2002 ; 2005 3,551) .
 9,994 AIS 1 injury 가
 .
 AIS Level . AIS I ,
 AIS 1 . 6-14
 .

6-14 (Distribution of Injuries)

	Towaway Crashes NASS 1988-96
Whiplash Injury Only (AIS 1)	34.2%
AIS 1 other than Whiplash	60.8%
AIS Greater than 1(Whiplash)	5.0%
	100.0%

57) Source: Data supplied by Pacific Institute for Research and Evaluation, Personal Communication 11/26/02. 2005 11,288 .

VII. 머리지지대 관련 비용

7-1
 가 LTVs
 , LTVs
 가
 가 7-1
 .58)
 (가)=
 가 =
 가
 =
 가
 =
 7-1 가
 (inch) (7-2). 7-
 259)
 2004 가가

58) 2007 2004 가
 , 2007 2004 8%
 가 . NHTSA(Office of Regulatory Analysis and Evaluation-
 National Center for Statistics and Analysis), FMVSS No. 202a Head Restraints 41-47,
 April 2007 .

59) Fladmark, G, and Khadikar, A., "Cost Estimates of Head Restraints in Light Trucks/Vans
 and Cost Estimates Of Lower Cost Antilock Brake Systems. Final Report", U.S. Depart-
 ment of Transportation, 22 July 1994, page 21.

Ⅵ.

가 , 가 ,
 . NHTSA , 7-2
 가 .

7-1 1992

Head Restraints System	(\$1993)	(\$2002)	1998
Chevy S10 PU/	26.40	31.02	214,314 \$6,647,870
GMC Sonoma/	26.40	31.02	50,483 \$1,565,947
Ford Econoline/	24.37	28.63	156,924 \$4,493,236
Ford Explorer/	28.12	33.04	390,460 \$12,901,423
Ford Mountaineer/	28.12	33.04	43,539 \$1,438,598
Toyota Previa/	58.04	68.19	14,723 \$1,003,978
	(210.23)	(224.95)	870,443 \$28,051,053
Ford F150PU/	28.11	33.03	723,867 \$23,909,979
Dodge Caravan/	35.51	41.72	268,238 \$11,190,702
Town and Country/	35.51	41.72	65,679 \$2,740,081
Voyager/	35.51	41.72	144,341 \$6,021,806
Jeep Cherokee/	31.98	37.57	134,031 \$5,035,236
Isuzu PU/	19.81	23.27	13,419 \$312,294
Chevy Silverado/	16.86	19.81	40,890 \$809,855

VII.

Head Restraints System	(\$1993)	(\$2002)	1998
Sierra/CK Pickup/	16.86	19.81	586,778 \$11,621,549
	(220.15)	(258.65)	1,977,243 \$61,641,502
	(411.6)	(483.6)	2,847,686 \$89,692,554

7-2

Head Restraints System	(+)	Net Cost ()	()	
Chevy S10/Sonoma PU/	31.12	28.04/2=14.12	11	\$1.27/inch 264,797 \$337,552
Ford Econoline/	28.63	27.48/2=13.74	10.75	\$1.28/inch 156,924 \$200,631
Ford Explorer Mountaineer/	33.04	32.28/2=16.14	9.75	\$1.65/inch 433,999 \$718,239
Toyota Previa/	68.19	56.46/2=28.23	9	\$3.14/inch 14,723 \$46,184
				870,443 \$13,026,074
Ford F150PU/	33.03	21.60/2=10.80	9	\$1.20/inch 723,867 \$868,343

Ⅵ.

Head Restraints System	(+)	Net Cost ()	()	
Dodge Caravan Voyager Town Country/	41.72	30.36/2=15.18	4.75	\$3.20/inch 478,258 \$1,528,205
Jeep Cherokee/	37.57	31.58/2=15.79	7	\$2.26/inch 134,031 \$302,295
Isuzu PU/	23.27	17.48/2=8.74	7 .75	\$1.13/inch 13,419 \$15,137
Chevy CK/Sierra Silverado/	19.81	14.76/2=7.38	6.75	\$1.09/inch 627,668 \$686,032
				1,977,243 \$3,400,011
				2,847,686 \$4,702,619

7-2

가 (\$2002)

가 (\$2002)

가 (\$2002)

1 \$31.50 \$1.65

7-1, 7-2, 7-3 2004
1999
, 1999 Toyota Camry
30.75 inches 2004 31.5
inches 0.75 inches
2004
800mm, 750mm
가
,
,
가 가 가
1998 1 5 5 5
8 1 4 가 , 7 4 가
가 가
7-2 가
1.3 inches 1.3
inches 가 \$4.29/inch (1.3 inches
× 2 × \$1.65). , 6 6 7 ×
강쟁강쟁강겅겅

Ⅵ.

1999 41%가 가
 20% 가 (,). ,
 가 , 39%
 41% 가 .

가 .

1 : 700mm 750mm

1.25 inches 가
 1 2 8 (\$12.8 million) × × ×
 × × .

2 : 750mm .
 0.935 inches 가 1

2 8 (\$12.8 million) .
 × × × × ×

33% 가 .

(3.06 inches)
 4 1 8 (\$41.8 million) × × × ×
 × .

, 1 8 9 (\$108.9 million)

강강강강강강

3 : ECE , 700mm
 750mm , 800mm

VII.

1.25 inches 가
 1 2 8 (\$12.8 million) × × ×
 × × .

4 : 가 700mm
 700mm

1.25 inches 가
 1 2 8 (\$12.8 million) × × ×
 × × .

7-3 가

		(Inches)
Toyota Camry	Adjustable	29.8
Saab 9-5	Fixed	31.3
Jeep Grand Cherokee	Adjustable	28.13
Dodge Caravan	Adjustable	27.63
Ford Explorer	Adjustable	29.0

7-3 2004

. 12

, 5

700 mm

. 5

41.7%() .

2004

750mm(29.5 inches) 가

Ⅵ.

NHTSA 가
가 .

가 1 \$0.16

. 14

가 50% (,

). 70% (7-2)

, (

80%) 33% 가

1 () : × ×

() : × 강쟁강쟁쟁겅괘 강쟁강쟁쟁겅괘

1 () : × ×

() : × × 강쟁강쟁쟁겅괘 강쟁강쟁쟁겅괘

, 강쟁강쟁쟁겅괘 강쟁강쟁쟁겅괘

NHTSA 가

. , NHTSA가

가 .

, (tilt forward)

가

2004

VII.

: 6 6 7
 : 1 2 8
 : 4 7
 : 8 4 2
 7 1 (6 6 7 +3 4
) 1 4 1 (1 2
 8 +1 3) . 1
 .
 : \$4.51
 : \$1.13 × ×
 : \$5.42

NHTSA 가
 .
 가 가
 가 NHTSA
 , NHTSA 가 (certification
 testing) 가 .
 (Insurance Corporation of British Columbia,
 ICBC) (head form test device)
 \$7,250 . 45
 , \$34 . ,
 \$102 × × 결과값값값

VI.

NHTSA SUV minivan

가

. NHTSA

가

, hatchbag station wagon()

가

. SUV minivan
(foldable seats)

,

. ,

가

.

. ,

,

. NPRM

.

.

VIII. 비용효과성(비용-효과분석)

1

.60)

가

, equivalent fatality (net cost)

. Equivalent fatality

가 fatality equivalents “ ”(wil-

lingness tp pay)

가

(societal be-

havioral measures)

8-1

. AIS

6 가

MAIS(Maximum Abbreviated Injury Scale) 1

MAIS 1

MAIS 1

60) 2007 2004 가 . NHTSA(Office of Regulatory Analysis and Evaluation-National Center for Statistics and Analysis), FMVSS No. 202a Head Restraints 48-59, April 2007 .

VIII. (-)

\$9,566 . \$6,550
\$3,016 .

“The Economic Impact of Motor Vehicle Crashes 2000”, page 62 .

8-1 0.0029 . , 2000

가 (consumer price index, CPI) 172.2 , 2002
가 179.9 , 2000 \$9.566 2002
× 가 . \$9,994
\$6,843
\$3,151 .

8-1 Comprehensive Fatality and Injury Relative Values

	2000 Relative 값강결관 Injury
MAIS 1	0.0029(only valid for whiplash injury)
MAIS 2	0.0458
MAIS 3	0.0916
MAIS 4	0.2153
MAIS 5	0.7124
Fatals()	1.000
* .	

8-1 equivalent
fatality . 345 가 1 fatality
(345 가 1
).

가
 (rate,)
 “ (social rate of time preference)
 (consumption rate of interest) 가
 가
 Robert Lind
 0 6% .62)
 Kolb and Sheraga 3
 1 5% .63) Moore and Viscusi
 2% .64) Moore and
 Viscusi
 (deferred health benefits)
 가 (sensitivity analysis)
 . 2% 4%

62) Lind, RC, “A primer on the Major Issues Relating to the Discount Rate for Evaluating National Energy Options”, in Discounting for Time and Risks in Energy Poicy, 1982, (Washington, D.C., Resources for the Future, Inc.). Lind
 가 (social discount rate, SDR)
 : ① : 가
 , ② : 가 , ③
 (marginal rate of return): , ④ :
 가 , ⑤ (risk):
 , 2004, 16 .
 63) J. Kolb and J.D. Sheraga, “A Suggested Approach for Discounting the Benefits and Costs of Environmental Regulations”, unpublished working papers.
 64) Moore, M.J., and Viscusi, W.K., “Discounting Environmental Health Risks: New Evidence and Policy Implications”, Journal of Environmental Economics and Management, V.18. 2, March 1990, part 2 of 2.

VIII. (-)

. 7% OMB
 , (marginal
 pretax rate of return)
 (safety benefits) (lifetime)

, NHTSA 가
 가
 가 , NHTSA 가

(8-3(a) 8-3(b)).

8-3(a) (Light Trucks Vehicle Miles Traveled and Discount Factor)

Light Truck						
Vehicle Age (Years)	Vehicle Miles Traveled	Survival Probability	Weighted Vehicle Miles Traveled	Fraction of Total VMT	7% Mid-Year Discount Factor	7% Present Discounted Value Factor
.....	
1	12,885	0.998	12,859	0.0839	0.9667	0.0811
2	12,469	0.995	12,407	0.0809	0.9035	0.0731
3	1,2067	0.989	11,934	0.0778	0.8444	0.0657
4	11,678	0.980	11,444	0.0746	0.7891	0.0589
5	11,302	0.967	10,929	0.0713	0.7375	0.0526
6	10,938	0.949	10,380	0.0677	0.6893	0.0467
7	10,585	0.924	9,781	0.0638	0.6442	0.0411
8	10,244	0.894	9,158	0.0597	0.6020	0.0360
9	9,914	0.857	8,496	0.0554	0.5626	0.0312
10	9,594	0.816	7,829	0.0511	0.5258	0.0268
11	9,285	0.795	7,382	0.0481	0.4914	0.0237

Light Truck						
Vehicle Age (Years)	Vehicle Miles Traveled	Survival Probability	Weighted Vehicle Miles Traveled	Fraction of Total VMT	7% Mid-Year Discount Factor	7% Present Discounted Value Factor
12	8,985	0.734	6,595	0.0430	0.4593	0.0198
13	8,696	0.669	5,818	0.0379	0.4292	0.0163
14	8,415	0.604	5,083	0.0332	0.4012	0.0133
15	8,144	0.539	4,390	0.0286	0.3749	0.0107
16	7,882	0.476	3,752	0.0245	0.3504	0.0086
17	7,628	0.418	3,189	0.0208	0.3275	0.0068
18	7,382	0.364	2,678	0.0175	0.3260	0.0057
19	7,144	0.315	2,250	0.0147	0.2860	0.0042
20	6,913	0.217	1,873	0.0098	0.2673	0.0026
21	6,691	0.232	1,552	0.0101	0.2498	0.0025
22	6,475	0.196	1,269	0.0083	0.2335	0.0019
23	6,266	0.169	1,059	0.0069	0.2182	0.0015
24	6,064	0.143	867	0.0057	0.2.39	0.0012
25	5,869	0.121	710	0.0046	0.1906	0.0009
				
			153,706	1.0000		0.6315

8-3(b) (Passenger Cars Vehicle Miles Traveled and Discount Factor)

Passenger Car Vehicle Age (Years)	VMT	Survival Probability	Weighted VMT	Fraction of VMT	7% Mid-Year Discount Factor	Present Discount Value Factor
1	13533	0.995	13465.3	0.1063	0.9667	0.1028
2	12989	0.988	12833.1	0.1013	0.9035	0.0915
3	12466	0.978	12191.7	0.0962	0.8444	0.0813

VIII. (-)

Passenger Car Vehicle Age		Survival	Weighted	Fraction of	7% Mid-Year Discount	Present Discount
(Years)	VMT	Probability	VMT	VMT	Factor	Value Factor
4	11964	0.962	11509.4	0.0909	0.7891	0.0717
5	11482	0.938	10770.1	0.0850	0.7375	0.0627
6	11020	0.908	10006.2	0.0790	0.6893	0.0544
7	10577	0.870	9202.0	0.0726	0.6442	0.0468
8	10151	0.825	8374.6	0.0661	0.6020	0.0398
9	9742	0.775	7550.1	0.0596	0.5626	0.0335
10	9350	0.721	6741.4	0.0532	0.5258	0.0280
11	8974	0.644	5779.3	0.0456	0.4914	0.0224
12	8613	0.541	4659.6	0.0368	0.4593	0.0169
13	8266	0.445	3678.4	0.0290	0.4292	0.0125
14	7933	0.358	2840.0	0.0224	0.4012	0.0090
15	7614	0.285	2170.0	0.0171	0.3749	0.0064
16	7308	0.223	1629.7	0.0129	0.3504	0.0045
17	7014	0.174	1220.4	0.0096	0.3275	0.0032
18	6731	0.134	902.0	0.0071	0.3260	0.0023
19	6460	0.103	665.4	0.0053	0.2860	0.0015
20	6200	0.079	489.8	0.0039	0.2673	0.0010
		11.946	126678	1		0.6922

20 LTVs 25
 , 2% 0.8766, 4%
 0.7775 7% 0.6618 .
 equivalent lives saved .
 ,
 equivalent life saved 2% ×
 (8-4(a)). , 1 equivalent life saved

양갱장장갱겅겅겅 , 양갱장장갱겅겅겅 , 양갱장장갱겅겅겅
 양갱장장갱겅겅겅 양갱장장갱겅겅겅

8-4(a) .

8-4(a) 1: Equivalent Lives Saved

Base Equivalent	2	4	7
	x 0.8766	x 0.7775	x 0.6618
Front 44.27	38.82	34.44	29.31
Rear 4.52	3.96	3.51	2.99
Total 48.79	42.77	37.93	32.29

8-4(b) Discounted Costs per Equivalent Life Saved(Million)

Base Equivalent	Undiscounted	2	4	7
\$70.1	\$1.58	\$1.81	\$2.04	\$2.39
\$14.1	\$3.12	\$3.56	\$4.01	\$4.71
\$84.2	\$1.71	\$1.97	\$2.22	\$2.61

8-4(c) 3 : Equivalent Life Saved(Million)

Base Equivalent	2	4	7
	x 0.8766	x 0.7775	x 0.6618
23.34	20.46	18.15	15.45
4.52	3.96	3.51	2.99
27.86	24.42	21.66	18.44

VIII. (-)

8-4(d) 3 : Discounted Costs per Equivalent Life Saved(Million)

Base Equivalent	Undiscounted	2	4	7
\$70.1	\$3.00	\$3.43	\$3.86	\$4.54
\$14.1	\$3.44	\$3.56	\$4.01	\$4.71
\$84.2	\$3.07	\$3.45	\$3.89	\$4.57

8-5(a)

Assumption for rear seat requirement		Number of Vehicles Involved			Costs per Equivalent Life Saved
() 가 700 mm , 750 mm	29.5 , 3	12 가 3	\$14.12 million (+)	1,559	\$ 4.71 million
750mm	29.5	12 가 10	\$110 million (+)	4,160	\$ 13.78 million
ECE , 700mm , 750mm , 800mm	29.5 , 3	12 가 3	\$14.12 million (+)	1,559	\$ 4.71 million

Assumption for rear seat requirement		Number of Vehicles Involved			Costs per Equivalent Life Saved	
() 가 700 mm	27.5	12 가	5	\$1.65 million ()	1,051	\$ 0.82 million
700 mm		(4)				
		(1)				

* 20%

* tilt head restraint

* 750mm 60%

8-5(a) (b) 4 가

8-5(b) , Equivalent Life Saved (Million)

Assumption for rear seat requirement				Costs per Equivalent Life Saved
(/) 가 700mm		\$70.1	15272	\$2.39
		\$14.1	1559	\$4.71
750mm		\$84.2	16831	\$2.61
	750mm	\$70.1	15272	\$2.39
		\$110.2	4160	\$13.78
		\$180.3	19432	\$4.8

VIII. (-)

Assumption for rear seat requirement				Costs per Equivalent Life Saved
ECE , 700mm 750mm , 800mm .		\$70.1	8050	\$4.54
		\$14.1	1559	\$4.71
		\$84.2	9609	\$4.57
가 700mm (/) , 700mm .	Front	\$70.1	15373	\$2.39
	Rear	\$1.65	1051	\$0.82
		\$71.75	16323	\$2.29

, NHTSA 2004 equivalent life saved

NHTSA 가 . Equi-
valent life saved 가
가 NHTSA :

1) FMVSS 208 /

2) FMVSS 214

3) FMVSS 201

(light vehicles) target points

8-6 3 가 .

FMVSS 208 equivalent life saved

. NHTSA FMVSS 208

가 equivalent life saved

FMVSS 208 FMVSS 201 equivalent life saved

2(750mm) equivalent life saved \$13.78 million 2004

NHTSA

8-6 Cost per Equivalent Life Saved Estimates Involving the Rear Seats of Passenger Vehicle(2002 , million)

	FMVSS 208 Rear Seat Lap/Shoulder Belts-Outboard	FMVSS 214 Passenger car Side Impact Proection	FMVSS 214 Upper Interior Head Protection
			0.53
		0.62	0.52
			0.55
	15.7% to 70%		
	5.65 to 1.28		4.42
	4.91 to 1.10	3.91	2.87
	13.88 to 3.28		10.33
			0.92
		0.97	0.88
			0.96

IX. 2004 최종규칙과 규제영향분석법률간 관계

2004

NHTSA가 가 . 「
 (Small Business Regulatory Enforcement Fairness Act, SBREFA) (Regulatory Flexibility Act, RFA) (small entities) 2004
 「 (Unfunded Mandates Reform Act of 1995, UMRA) ,
 2004 .

1. (REGULATORY FLEXIBILITY ACT, RFA)

1980 RFA , (small organizations)(organizations)() (small government jurisdiction)(50,000)

가 . “ ”
 , 1 (preliminary regulatory flexibility analysis, PRFA) (§ 605(b)).

RFA § 603 . . (small entities) PRFA . § 603 (b)

PRFA . PRFA

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IX. 2004

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NHTSA RFA

2004

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1. (REGULATORY FLEXIBILITY ACT, RFA)

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가 .

NHTSA
2004

. ,
2004
, 가 2004
가

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가

, 2004 가

(small entities)

NHTSA .65)

가 , NHTSA

65) 2007 2004 (flexi-
bility)
. NHTSA(Office
of Regulatory Analysis and Evaluation-National Center for Statistics and Analysis), FMVSS
No. 202a Head Restraints 61, April 2007 .

2. (UNFUNDED MANDATES REFORM ACT, UMRA)

UMRA NHTSA , 2004 2004
 가
 가 (State),
 1 (1995)
 .⁶⁶⁾ 1 2002 GDP Deflator⁶⁷⁾
 가 강강강강강강강강 강강강강강강강강

NHTSA 49 U.S.C. §§ 322, 30111, 30115, 30117, 30166 49 CFR
 § 1.50 , 800mm(31.5 inches)

66) 1995 UMRA Title II , ,
 가
 . UMRA § 202(2 U.S.C. § 1532) , NHTSA “ , ,
 1 1 ,
 1 1 ,
 ”
 . “ (Federal mandate)” § 421(6)(2 U.S.C. § 658(6))
 “ ” “ ”
 “ ” “ , ,
 ” (§ 421(5)(A)(i), 2
 U.S.C. § 658(5)(A)(i)) . “ ”
 가
 (§ 421(7)(A), 2 USC § 658(7)(A)). NHTSA가
 UMRA NHTSA 가 , 가 - 가

67) GDP Deflator = 명목 실질 ×
 , 1995 가 100 , 2002 GDP가 110.66
 2002 GDP가 98.11 2002 GDP (110.66/98.11)×100 =
 112.7 . , GDP 가 112.7 1995 가 2002
 가가 12.7% .

2.

(UNFUNDED MANDATES REFORM ACT, UMRA)

750mm(29.5 inches)

, 55mm 가 2004

2004

. 2004

8 4 2 .68)

, 2004

, 2004

, NHTSA

UMRA § 203

68) 2007

2004

9 9 9

가

(2005

)가

X. 차량의 중간 좌석에 위치하는 머리지지대의 비용과 편익

NHTSA

1.

(inch) 가

1 \$15.75 , 1

(inch) \$1.65 . 1 inch

(light vehicle fleet) 20% , 3.11million × 광광광광광광

\$15.75 . NHTSA가

가 800mm

, 800mm (31.3 inches)

33mm(1.3 inches) . 33mm(1.3 inches)

\$2.15(1.3 x \$1.65) . , 가

\$17.90(\$15.75+\$2.15) .

\$55.67million 광광광광광광 광광광광광광 ×

10-1

가

가 가 (10-1).

X.

10-1

가

Vehicles	Inches to be raised	1998 Sales	Sales Weighted Inches
Accord	4.75	401071	1905087
Neon	4.75	78533	373032
Lumina	7.375	177631	1310029
Cavalier	2.435	256099	623601
Malibu	6.5	223703	1454070
Calillac	4.935	182151	898915
	4.976	1319188	6564734

* 4.976 (6,564,734/1,319,188)

가

1998 15.55 million
 8.14 million 7.40 million
 79% () 가
 12.29 million × , 127mm(5 inches)
 , 1 \$8.25 ×
 \$101.39million 127mm(5 inches) ×
 가 \$0.16
 , 가 \$0.5
 million × 127mm(5 inches) × 가 ,
 가 \$2.0million × 127mm(5 inches) ×
 , \$2.5
 million .

\$159.56(\$55.67+\$101.39+\$2.5) million .

2.

10-2 (Tow-Away Crashes
in NASS-CDS 1988-1996)

Body-type		Whiplash raw	Annual Average Whiplash Weighted
Car	가	2	133
Light Truck	가	2	316
		4	449
Car	가	7	1,363
Light Truck	가	2	149
		9	1,512
		13	1,961

449

1,512

가

3.0

.69)

1,347

×

, AIS 1,

1.29

.70)

69) VI. 50 .

70) VI. 50 .

X.

1,738 × .

5851 × × .

2004 (800 mm, 31.5 inches)

(55mm or less) 5.83% .71)

, ×

:

: × ×

: ×

:

750mm 55mm

21.83% (5-6). ,

1,277 ×

:

: × ×

: ×

:

86 ,

1,064 ,

71) Kahane, C., "An Evaluation of Head Restraints, Federal Motor Vehicle Safety Standard 202" NHTSA Feb 1982, DOT HS-806-108, Pg 280 5-6

3. Cost Per Equivalent Fatality

8-1 , 345 1
 . , 86
 0.25 가 . 가

1,064 3.08 .

Cost/ Equivalent Fatality :

- : 강쟁강쟁쟁겂괘
- : 강쟁강쟁쟁겂괘
- / : 강쟁강쟁쟁겂괘

Chapter VIII , 20 25

가

Cost/Equivalent Fatality

10-3(a) Equivalent Lives Saved

Base Equivalent	2	4	7
	x 0.8871	x 0.7946	x 0.6844
Front Center 0.2	0.22	0.19	0.17
Rear Center 3.08	2.70	2.39	2.04
Both 3.33	2.92	2.59	2.20

X.

10-3(b) Discounted Costs per Equivalent Lives Saved

	2	4	7
Front Seat	\$256.31 million	\$288.98 million	\$339.50 million
Rear Seat	\$38.29 million	\$43.17 million	\$50.72 million
Total	\$54.66 million	\$61.63 million	\$72.40 million

7% 2004
 equivalent life saved \$339.50 million ,
 equivalent life saved
 \$50.72 million . ,
 equivalent life saved 7%
 \$72.40 million .

4. 가

가 ,
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NHTSA

XI. 맺는말

NHTSA가, 2004
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NHTSA 2004

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XI.

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 287 가 ,
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73) , , , 2004. 8, 193 .
 74) , 가, 2007. 9.
 2001 4 2006 12 16 가
 239 () 287 가
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- , · , 2004.
- , 가 , , 2007.10.
- , 가 , , 2007. 9.
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부 록

[부록: 2007 최종규칙]

○

2004 12 FMVSS (‘2004 ’)
 H-point 가
 800mm(31.5 inches) . ,
 H-point 750mm(29.5 inches)
 . 2004
 ,
 (seatback angle) 25
 . , 2004
 3가 (가 2 2007)
 . , 2007
 design torso angle¹⁾ ,
 55mm 2004
 . , 2007 (effective back-
 set) 61mm가 .
 4가 . ,
 1 2004 seatback angle 25
 가 55mm .

1) Design Torso Angle 가
 seat back angle . R
 Reference point R-point . R-Point Design Torso Angle
 , R-point
 H-point . H-Point ,
 R-Point . Peter Horn, GR/VZS, “GTR head
 restraints backset measuring method Analyses of H-point and R-point”, May 3rd 2007.

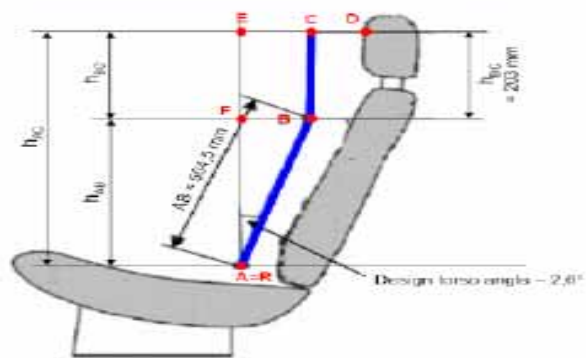
2 2007

design torso angle

3 4 seatback angle 25

60mm, 65mm

	2004 Final Rule	2007 Final Rule		Largest Backset Considered
	Option 1	Option 2	Option 3	Option 4
Required Backset	55mm	55mm	60mm	65mm
Seatback Angle	25	Design	25	25
Effective Backset	55mm	61mm	60mm	65mm



Folie 2

○

1, 2, 3, 4

(: 2004).

	2004 Final Rule	2007 Final Rule	Option 3	Largest Backset Considered
	Option 1	Option 2		Option 4
	15,093	11,471	12,089	9,653
	1,558	1,558	1,558	1,558
	16,651	13,029	13,647	11,211

○

2004 2007

가 . ,

1 .

: \$4.89

가 : \$1.23

1 : \$5.88

\$83.2million(8 3 2

) \$16.7million(1 6 7)

\$99.9million(9 9 9) .

○

4가 equivalent life saved

(Million).

	2004 Final Rule		2007 Final Rule				Largest Backset Considered	
	Option 1		Option 2		Option 3		Option 4	
Effective Backset	55mm		61mm		60mm		65mm	
	3%	7%	3%	7%	3%	7%	3%	7%
	\$2.32	\$2.91	\$3.06	\$3.83	\$2.90	\$3.64	\$3.63	\$4.55
	\$4.52	\$5.66	\$4.52	\$5.66	\$4.52	\$5.66	\$4.52	\$5.66
	\$2.53	\$3.17	\$3.23	\$4.05	\$3.09	\$3.87	\$3.76	\$4.71

I .

2004

2007

2009 9 1

2010

80%

2007

55mm

25

seatback angle

(design torso angle)

NHTSA

4 가

2004

272,088

1969

FMVSS No. 202

가 700mm가

2004
가

Ⅲ. 2007

2007 가 가
가 750mm(29.5
inches) FMVSS No. 202 700mm
(27.5 inches)
가 800mm(31.5 inches)

가 : , 2가
3가
가 seatback angle(design torso
angle) 55mm

2004
55mm , seatback angle

1.

2004 NPRM , NHTSA 가
50mm

가 750mm 800mm

가

0

, 2004

50mm 55mm

750mm 800mm

55mm

2004

55mm 65, 70, 80, 90mm

seatback torso angle 25

55mm

80mm

2004

가

Johnson Controls

90mm

가

2. (Seatback Angle for Backset Measurement)

NHTSA 2004
 55mm seatback angle 25
 , 가
 torso angle 25
 torso angle
 , torso angle 25
 , design torso angle .
 NHTSA SAEJ1100
 가 . 1995 2000
 566 design torso angle
 , 8 , design seatback angle
 . 3-1
 .
 2005 7 20 .
 design torso angle 18 28
 , 25
 IIHS torso angle 25 .

3-1 Design Seatback Angle for 1995-2000(MY) Vehicles

					가	가
566	23.8	18-28	24	2.1	23.5	24

1990 , UMTRI

. UMTRI NHTSA .
 . 15
 . seatback angle .
 가 SAEJ826 가
 seatback angle 3 . 3 seatback angle R-point
 . ,
 seatback angle . 3가 seatback angle R-point
 seatback angle .
 , design seatback angle 가 seat-
 back angle . 가 seatback
 angle design seatback angle 1.6 가 .
 UMTRI가 NHTSA 60 120
 . 1990-1995 24
 . design seatback angle 19
 . , 가 seatback
 angle , seatback angle

NHTSA UMTRI , design seatback
 angle 가 seatback angle 가
 . , seatback angle 가 .

3. 4가 Option

4가 .

Option 1 : seatback angle 25 , 55mm

IIHS 2004 .

Option 2 : design torso angle, 55mm
 design torso angle 가 23.5 2004
 torso angle 25 가 . seatback angle 1
 4mm 6mm
 . , 55mm 61mm
 가 . 24%

Option 3 : seatback angle 25 , 60mm
 3 seatback angle 2004 ,
 60mm . 20%

Option 4 : seatback angle 25 , 65mm
 4 seatback angle 2004 ,
 65mm . 36%

3-2 .

. Effective backset seatback angle 1 4mm
 . ,
 . 2004
 가 3-4mm가 .
 2004 1 가
 가 2-3mm 가 . 가
 seatback design angle 23.5

3-4.5mm 가 . design angle
 3-4.5mm 가
 가
 2004 1 1
 2 design angle seat-
 backangle 25 1.5 가 effective backset 6mm
 가 . 24%
 3 effective backset 60mm , 4 effective
 backset 65mm 가 .

3-2

Option	Required Backset	Effective Backset	Required Seat Back Angle	Weighted Seat Back Angle	Front Seat Benefits Reduction	Total Benefits Reduction
1	55	55	25	25	0	0
2	55	61	Design	23.5	24%	22%
3	60	60	25	25	20%	18%
4	65	65	25	25	36%	33%

IV.

1.

, 가
 가

가
가 .

4-9 .

4-9 4가

Backset	Backset Effectiveness	Whiplash Effectiveness
55mm	3.5	5.83
60mm	2.5	4.17
61mm	2.3	3.83
65mm	1.7	2.83

2. 4가

NHTSA 4가 .

Option 1 : seatback angle 25 , 55mm

$$94,531 + 219,995 = 314,526 .$$

$$\times \begin{matrix} 1 \\ 8 \end{matrix} \cdot \begin{matrix} 1,700 \\ (0.471)가 \end{matrix} \quad \begin{matrix} 9 \\ (0.529)가 \end{matrix}$$

: ×

: ×

,

.

Option 2 : design torso angle, 55mm

$$94,531+219,995=314,526 \quad .$$

2

.

$$\times \quad \times \quad ,$$

$$\times \quad \times$$

.

$$: \quad \times$$

$$: \quad \times \quad \times$$

$$, \quad 4,907 \quad .$$

Option 3 : seatback angle 25 , 60mm

$$94,531+219,995=314,526 \quad .$$

3

.

$$\times \quad \times \quad ,$$

$$\times \quad \times$$

.

$$: \quad \times$$

$$: \quad \times \quad \times$$

$$, \quad 12,089 \quad .$$

Option 4 : seatback angle 25 , 65mm

$$94,531 + 219,995 = 314,526$$

4

.

× × ,

× ×

: ×

: × ×

, 9,653

4-10

4가

4-10 4가

	2004 Final Rule	2007 Final Rule		Largest Backset Considered
	Option 1	Option 2	Option 3	Option 4
	15,093	11,471	12,089	9,653
	1,558	1,558	1,558	1,558
	16,651	13,029	13,647	11,211

VII. -

1 가

2004 2007

2004 가

7-2 4가

equivalent fatality

7-2 1 : Equivalent Fatalities

Injury Benefits		Equivalent Fatalities
	15,093	43.77
	1,558	4.52
	16,651	48.29

7-2(a) 2 : Equivalent Fatalities

Injury Benefits		Equivalent Fatalities
	11,471	33.27
	1,558	4.52
	13,029	37.78

7-2(b) 3 : Equivalent Fatalities

Injury Benefits		Equivalent Fatalities
	12,089	35.06
	1,558	4.52
	13,647	39.78

7-2(c) 4 : Equivalent Fatalities

Injury Benefits		Equivalent Fatalities
	9,653	27.99
	1,558	4.52
	11,211	32.51

1 Equivalent

Fatality

1 :

강쟁강쟁쟁겅괘	강쟁강쟁쟁겅괘
강쟁강쟁쟁겅괘	강쟁강쟁쟁겅괘
강쟁강쟁쟁겅괘	강쟁강쟁쟁겅괘

2 :

강쟁강쟁쟁겅괘	강쟁강쟁쟁겅괘
강쟁강쟁쟁겅괘	강쟁강쟁쟁겅괘

양쟁쟁쟁쟁쟁쟁 양쟁쟁쟁쟁쟁쟁

3 :

양쟁쟁쟁쟁쟁쟁 양쟁쟁쟁쟁쟁쟁

양쟁쟁쟁쟁쟁쟁 양쟁쟁쟁쟁쟁쟁

양쟁쟁쟁쟁쟁쟁 양쟁쟁쟁쟁쟁쟁

4 :

양쟁쟁쟁쟁쟁쟁 양쟁쟁쟁쟁쟁쟁

양쟁쟁쟁쟁쟁쟁 양쟁쟁쟁쟁쟁쟁

양쟁쟁쟁쟁쟁쟁 양쟁쟁쟁쟁쟁쟁

7-4 4가 Equivalent Life Saved .

7-4(a) 1 : Equivalent Life Saved

Base Equivalent	3%	7%
	×	×
43.77	35.80	28.56
4.52	3.70	2.95
48.29	39.50	31.51

7-4(b) 1 : Discounted Cost per Equivalent Life Saved(in millions)

Base Equivalent	Undiscounted	3%	7%
\$83.2	\$1.90	\$2.32	\$2.91
\$16.7	\$3.70	\$4.52	\$5.66
\$99.9	\$2.07	\$2.53	\$3.17

7-4(c) 2 : Equivalent Life Saved

Base Equivalent	3%	7%
	×	×
43.77	27.21	21.71
4.52	3.70	2.95
48.29	30.91	24.66

7-4(d) 2 : Discounted Cost per Equivalent Life Saved(in millions)

Base Equivalent	Undiscounted	3%	7%
\$83.2	\$2.50	\$2.88	\$3.83
\$16.7	\$3.70	\$4.53	\$5.66
\$99.9	\$2.64	\$3.06	\$4.05

7-4(e) 3 : Equivalent Life Saved

Base Equivalent	3%	7%
	×	×
35.06	28.68	22.88
4.52	3.70	2.95
39.58	32.37	25.83

7-4(f) 3 : Discounted Cost per Equivalent Life Saved(in millions)

Base Equivalent	Undiscounted	3%	7%
\$83.2	\$2.37	\$2.90	\$3.64
\$16.7	\$3.70	\$4.52	\$5.66
\$99.9	\$2.52	\$3.09	\$3.87

7-4(g) 4 : Equivalent Life Saved

Base Equivalent	3%	7%
	×	×
27.99	22.90	18.27
4.52	3.70	2.95
32.51	26.59	21.22

7-4(h) 4 : Discounted Cost per Equivalent Life Saved(in millions)

Base Equivalent	Undiscounted	3%	7%
\$83.2	\$2.97	\$3.63	\$4.55
\$16.7	\$3.70	\$4.52	\$5.66
\$99.9	\$3.07	\$3.76	\$4.71