

June 11, 2019

U.S. Department of Transportation  
Docket Operations, M-30  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue SE  
Washington, DC 20590

Re: Petition for Decision of Inconsequential Noncompliance  
Ref: Docket No. NHTSA-2018-0004; Fed. Reg. Vol. 84, No.92, May 13, 2019

Freedman Seating Company (FSC) is a manufacturer of seating for the transportation industry. We provide seats for various transportation vehicles including, but not limited to school/activity buses. FSC is pleased to submit the following comments in support of Daimler Trucks North America, LLC (DTNA) Petition for Decision of Inconsequential Noncompliance (Docket No. NHTSA-2018-0004).

1. FSC has designed and manufactured passenger seats for the school/activity bus market for over 20 years. We concur with the assessment that rear surface seat back-only testing represents the industry norm and that front of the seat back testing is generally not conducted due to the low risk of harm from the front, and because the small head impact zone makes it impossible to conduct the test per the recommended test procedure. The front surface of the seat back is low risk for head impact and injury potential as the normal position of the seat occupant is with the head against the front surface of the seat back or very close to it.
2. The head impact zones identified in the FMVSS 222 test procedure are relatively small areas and would make it challenging to do head impact testing given the size of the head form and the seat contour of some seat designs.
3. We also agree that the most accurate measure of head safety for the front of the seat is the product's head injury criterion (HIC) values.

Thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions.

Dave Klopp  
Director Quality, Testing & Compliance  
[Freedman Seating Company](http://www.freedmanseating.com)  
4545 W. Augusta Blvd.  
Chicago, IL 60651  
Office: 773-524-3241  
An ISO 9001 Registered Company