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November 22, 2019

Carla Rush

Office of Crashworthiness Standards  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590

RE: **Docket No.: NHTSA-2019-0093**, Federal Motor Vehicle Safety Standards; Occupant Crash Protection

Dear Ms. Rush:

On behalf of the American Academy of Pediatrics (AAP), a non-profit professional organization of over 67,000 primary care pediatricians, pediatric medical sub-specialists, and pediatric surgical specialists dedicated to the health, safety, and well-being of infants, children, adolescents, and young adults, I am writing to provide comments on the Advanced Notice of Proposed Rulemaking (ANPRM) regarding proposals to amend the Federal Motor Vehicle Safety Standard No. 208 on occupant crash protection to require automobile manufacturers to install seat belt reminder systems for rear vehicle seats. AAP strongly supported the petition for rulemaking submitted by Public Citizen and Advocates for Highway and Auto Safety and supports the decision of the National Highway Traffic Safety Administration (NHTSA) to grant the petition, and urges NHTSA to advance this proposal expeditiously.

Despite significant reductions in the number of children killed in motor vehicle accidents (MVAs) over the past decade, MVAs remain the leading cause of death among children aged 4 and older. Children and adolescents represent approximately 15% of all people killed each year in MVAs. Proper and consistent use of seat belts by occupants who have outgrown car safety seats is essential to preventing injuries and death and can reduce the risk of serious injury or death by 40% for children aged 4-14 years old. The AAP recommends that all children younger than 13 should ride in the rear seat, and seat belt use is no less important for passengers in rear seats than for those in the front. It is also particularly critical to encourage seat belt use by teen passengers, whose rate of seat belt use lags far behind that of adults. However, many state laws do not require seat belt use in rear seats.

Seat belt warning systems are a valuable safety feature shown to encourage seat belt use. While FMVSS No. 208 requires a seat belt warning system for the driver's seat, it does not currently require rear seat belt warning systems. These requirements and technological advances have led to much safer front row seats, but rear seat safety has not kept up with these improvements. A comprehensive and evidence-based requirement for rear seat belt warning systems has the potential to save hundreds of lives, a large proportion of whom would be children. AAP supports NHTSA's ANPRM and urges the agency to develop an effective requirement as soon as possible.

In NHTSA's consideration of the specifications for a potential rear seat belt warning system requirement, AAP urges NHTSA to take into account children's unique developmental characteristics to maximally improve child passenger safety. The AAP recommends an audio-visual rear seat belt warning, given that research demonstrates that audible warnings in conjunction with visual warnings are generally more effective than text or icons alone.

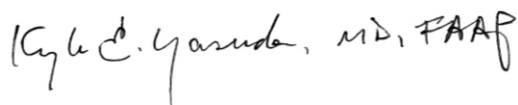
The AAP recommends that thoughtful consideration be given to the interaction between rear-seat belt reminder systems and use of Lower Anchors and Tethers for Children (LATCH) for installation of car safety seats. Specifically, the reminder system should be able to recognize when a car safety seat is installed with LATCH instead of the seat belt and should not activate under those conditions. While this may add to the complexity and cost of the warning system, avoiding nuisance alarms will improve driver attention to the warning system.

The AAP also encourages NHTSA to work with manufacturers to discourage drivers from placing heavy, unsecured cargo in the rear seat while the car is in motion, as this may pose an injury risk to occupants in a crash. Cargo heavy enough to trigger the rear-seat belt reminder system would be more safely stored in the trunk of the vehicle.

Additionally, the AAP encourages NHTSA to consider other possible uses for the technology used in a rear-seat belt reminder system, particularly the potential to prevent caregivers from forgetting small children in the rear seat when exiting the vehicle. Hyperthermia events are devastating and we need technological innovation and policy requirements to prevent such tragedies. Leaving children behind in a hot car is a problem that has been resistant to behavior-based interventions. Because the caregiver does not intend to forget a child, anticipatory guidance and public health messages are intrinsically less helpful than a technology-based reminder system would be. Therefore, adapting the rear-seat belt warning system to alert drivers when an individual remains in the car after the ignition is turned off could be a significant step toward reducing and eliminating infant and child hyperthermia deaths. Safety advances in front row seats, such as pretensioners and load limiters, should be considered for adaptation to rear seats to ensure child passengers are as safe as possible.

For the reasons stated above, the AAP strongly supports this petition and urges NHTSA to act favorably upon it. Thank you for the opportunity to comment on this ANPRM. Thank you again for the opportunity to provide input on this critical issue for child health and safety. If you have any questions, please contact Zach Laris in our Washington, D.C. office at 202/347-8600 or [zlaris@aap.org](mailto:zlaris@aap.org).

Sincerely,



Kyle E. Yasuda, MD, FAAP  
President  
KEY/zml

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<sup>i</sup> Durbin DR, Jermakian JS, Kallan MJ, McCartt AT, Arbogast KB, Zonfrillo MR, and Myers RK. Rear seat safety: Variation in protection by occupant, crash and vehicle characteristics. *Accident Analysis and Prevention*. 2015;80:185–192. doi:10.1016/j.aap.2015.04.006.