



**BOSCH**

November 26, 2019

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The Honorable James Owens  
Acting Administrator  
National Highway Traffic Safety Administration  
US Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Re: Advanced Notice of Proposed Rulemaking to Amend Federal Motor  
Vehicle Safety Standard No. 208 – Occupant Crash Protection  
**Docket No. NHTSA-2019-0093**

Dear Acting Administrator Owens,

Robert Bosch LLC (Bosch) appreciates the opportunity to offer its perspective concerning the agency's consideration of rear seat belt reminder systems.

Bosch respectfully urges NHTSA to progress with a rulemaking on rear seat belt reminder systems as this technology has the potential to decrease the number of injuries and fatalities associated with vehicular crashes in the United States. NHTSA's own research and data<sup>1</sup> has repeatedly affirmed the safety benefits of seat belts. As noted in the ANPRM, "seat belts reduce the risk of fatality for rear outboard occupants by 54 percent (passenger cars) and 75 percent (light trucks and vans), and for center occupants, by 58 percent (passenger cars) and 75 percent (light trucks and vans)."<sup>2</sup> The recent data released by the Governors Highway Safety Association<sup>3</sup> highlights the ongoing challenge as rear seat occupants continue not to use their seat belts as often as individuals seated in the front seat. The GHSA report states that "observed rear belt use nationwide continues to lag significantly behind front seat belt use: 76% versus 90%, respectively." The GHSA study also found that in 2018 "there were 803 deaths of unbelted rear seat occupants age 8 and older. More than 400 would have survived had they been belted."

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<sup>1</sup> Charles J. Kahane. 2015. Lives Saved by Vehicle Safety Technologies and Associated Federal Motor Vehicle Safety Standards, 1960 to 2012—Passenger Cars and LTVs—With Reviews of 26 FMVSS and the Effectiveness of Their Associated Safety Technologies in Reducing Fatalities, Injuries, and Crashes. DOT HS 812 069; U.S. Department of Transportation; NHTSA; p. 89.

<sup>2</sup> Charles J. Kahane. 2017. Fatality Reduction by Seat Belts in the Center Rear Seat and Comparison of Occupants' Relative Fatality Risk at Various Seating Positions. DOT HS 812 369; U.S. Department of Transportation; NHTSA; pp. 18–20.

<sup>3</sup> "Rear Seat Belt Use: Little Change in Four Years, Much More to Do"; Governors Highway Safety Association; November 18, 2019



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Bosch supports harmonization and alignment with the United Nations Economic Commission for Europe (UN ECE) Regulation No. 16. The adoption of consistent requirements would speed the implementation of rear seat belt reminder systems and make the safety-related benefits available to consumers as soon as possible.

Bosch requests that NHTSA maintain a technology-agnostic approach as it moves forward with this important rulemaking, particularly when considering the sensing requirements necessary for rear seat belt reminder systems. Although the primary technological approaches presently available in the market are weight-based, companies are studying and assessing new sensor technology that could enable this functionality in the future. For example, Bosch believes that cameras can provide an enhanced mechanism for distinguishing between objects and people. The final regulations should permit the industry to adopt such approaches as they are validated and become available in the market.

Bosch strongly supports NHTSA's October 16, 2019 announcement that it will proceed with an update of the US New Car Assessment Program (NCAP). Bosch believes that a modernized US NCAP could provide an appropriate avenue to encourage the adoption of enhanced seat belt warning systems, such as those that incorporate occupant detection.

Bosch appreciates NHTSA's consideration of its feedback concerning the ANPRM on FMVSS 208 and Rear Seat Belt Reminder Systems.

We would be pleased to address any questions or to provide additional information. Please do not hesitate to contact Ana Meuwissen at 202/815-7645 or at [Ana.Meuwissen@us.bosch.com](mailto:Ana.Meuwissen@us.bosch.com) with any inquiries.

Yours sincerely,

A handwritten signature in black ink that reads "Alan Manna". The signature is fluid and cursive, with the first name "Alan" and last name "Manna" clearly distinguishable.

Alan Manna  
Regional President  
Car Multimedia  
Robert Bosch LLC



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A handwritten signature in black ink, appearing to read 'Ana M. Meuwissen'.

Ana M. Meuwissen  
Director, Federal Government Affairs  
Robert Bosch LLC