

As someone who has lost a close friend due to a car accident, I'm in great support of this regulation. Front seat belt warning lights have been around for over forty years and with increased driver distraction, among other things, ensuring safety for *all* passengers is becoming increasingly important. Consumer satisfaction will likely be high for this new legislation, as seen in the studies mentioned in the docket. This proposed rule is especially important as back-seat passengers are often times at more risk than front seat passengers. Specifically, one study found that those in rear seats are at a 46% greater fatality risk than passengers in front seats<sup>1</sup>. Some of this risk can likely be attributed to the fact back seats aren't equipped with airbags while front seats are. Since the first requirement of seat belt warning systems in 1975, injuries and deaths from car crashes have decreased exponentially. For example, crash deaths per 100,000 in 2017 were almost half of that of 1975<sup>2</sup>. Although the introduction of the seat belt warning system doesn't account for the entirety of this decrease, it probably is one of the main explanations behind this drastic reduction in crash deaths. The following comments are in regards to specific questions asked by the agency:

1) *Should the warning be visual-only, audible-only, or audio-visual?* The warning should incorporate both audio and visual components. Oftentimes, drivers don't notice something on their dashboard until several minutes later because their focus is on the road. By including both components, the warning system ensures passengers will be able to notice it, regardless of the situation. Also, if prompted with a sound most regard as "annoying", passengers are more likely to fasten their seatbelts to eliminate the source of the sound, rather than if it was a strictly visual feature.

2) *...should there be a warning if a seat belt becomes unbuckled in the course of a trip?*... Yes, there should be a warning if a seat belt becomes unbuckled during the course of a trip. Although it's rare, there are cases of young children unfastening their seat belt and sneaking out the door onto a busy road. By featuring a change-of-status alert, cases like this will decrease, if not disappear completely.

13) *Who should the signal warn—the driver, the rear passenger(s), or both?* The signal should warn both the driver and rear passengers. By warning both parties, rear passengers are able to fasten up quicker without waiting for driver instruction. This feature would help both parties by allowing the driver to devote their attention to the road (rather than back seat passengers) and notifying back-seat passengers of their unsafety.

19) *...We especially seek comment on whether a rear seat belt warning should be required for high-occupancy vehicles such as ... school buses...* I do not believe this proposed regulation

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<sup>1</sup> Durbin, D. R., Jermakian, J. S., Kallan, M. J., McCartt, A. T., Arbogast, K. B., Zonfrillo, M. R., & Myers, R. K. (2015). Rear seat safety: Variation in protection by occupant, crash and vehicle characteristics. *Accident Analysis and Prevention*, 80, pp. 185-192.

<sup>2</sup> National Highway Traffic Safety Administration. "FARS Encyclopedia." *FARS Encyclopedia*, 2017, [www-fars.nhtsa.dot.gov/Main/index.aspx](http://www-fars.nhtsa.dot.gov/Main/index.aspx).

should apply to school buses. Most school buses don't even have seat belts. In fact, only six of the fifty states require them<sup>3</sup>. By mandating this regulation for school buses without providing proper funding, impoverished school districts are put at great risk. Additionally, the warning system would create a major source of driver distraction because of the large quantities of students they carry. Along with this, some seats on school buses aren't used to seat students. Oftentimes, students place their book bags or instruments in empty seats. This luggage would most likely create a false alarm because the wiring for warning systems merely rely on weight exerted and wouldn't be able to distinguish between a heavy instrument and a student. In total, this system would only create distractions and financial burdens if the ANPRM includes school buses in its final rule.

Because of these reasons, I'm in strong support of this Advanced Notice of Proposed Rulemaking. Thank you for the opportunity to comment on these issues.

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<sup>3</sup> Essex, Amanda, and Kathy Brangoccio. "Should School Buses Have Seat Belts?" *National Conference of State Legislatures*, June 2016, [www.ncsl.org/research/transportation/should-school-buses-have-seat-belts.aspx](http://www.ncsl.org/research/transportation/should-school-buses-have-seat-belts.aspx).