

Comment from William Miller

As an employee of an automotive seating component manufacturing company, I appreciate the opportunity to comment on this issue. I am submitting these comments in regard to the Notice of Proposed Rulemaking (NPRM) published in the Federal Register (Volume 84, No. 188, pages 51076- 51090) on September 27, 2019.

The company of my employment manufactures seating components, including SBR (seat belt reminder) for several different automotive manufacturing companies. This issue is becoming more and more prevalent in the automotive world. This issue is also of importance to me as we provide seating components for the manufacturing of large passenger busses and cargo vans. Although we are not directly tied to the manufacture and installation of the seat belts, our products are created for the seat belt reminder notification for the drivers on these vehicles.

Future vehicles could make travel more difficult without everyone using their seat belts, but it's not just your passengers who would benefit. Unbelted passengers become projectiles in an accident, the Insurance Institute for Highway Safety says, increasing the risk of injury or death to other occupants by 40%. A personal family incident attests to this fact. Although this family members lost both legs, the fact that seats belts were worn by all passengers saved his man's life.

Although my employer feels they are necessary, specific details remain unclear. "The agency is in the early stages of establishing performance requirements for rear seat belt reminder systems," a spokesman for the National Highway Traffic Safety Administration said. "These systems are still being evaluated by the agency."

The law has been a long time coming. Seat belt reminders for the front seats have been around since the 1970s, and NHTSA requires them for the driver's seat. Most new cars, according to NHTSA, include a belt warning for the front passenger seat, too. How effective are they? A government study in 2007 found that what officials call "enhanced seat belt reminders", which combine sound, icon or text warnings, improved belt use by 3.9%. An IIHS study in 2010, meanwhile, found driver fatality rates were 6% lower in vehicles with enhanced belt reminders.

On page 51083, the Agency asks for comment on warning systems that utilize occupant detection. Many passenger vehicles now come equipped with the capability to detect occupancy. The SBR that my company manufactures increases the price of our seats by only \$1.03. Many disagree and state that this amount adds up and will cause schools to buy buses with no seatbelts. If you do the math, added these reminders to a bus with 30 rear seats will only cause an increase of \$30.00. In the area I live, even though funds are tight for education, \$30.00 is a cheap increase to add another layer of safety for the students.

Who are usually those in the rear of a vehicles, younger individuals who normally do not wish to use a seat belt. Unbelted backseat occupants are a "significant" problem, IIHS spokesman Russ Rader said, noting that backseat passengers wearing lap and shoulder belts face a 44% lower risk of fatal injury in cars and 73% lower risk in vans and SUVs. But teenage passengers are at particular risk. NHTSA noted that teens buckle up far less frequently than adults, with some 20% of teens and young adults going unbelted in a 2008 study. In 2009, 56% of 16- to-20-year-olds involved in fatal accidents were unbuckled. Any reminder we can add to help those who normally "forget" to use a seat belt, I feel we should do so.

Although few studies have been conducted on the effectiveness of installing rear seat belt reminders, many have been completed on those installed for front passenger seats and they work! it will be a few years before backseat reminders show up. The highway bill gives the Secretary of Transportation up to three years to issue a final rule. In the meantime, keep reminding those in back to buckle up.