



GENERAL MOTORS LLC  
Global Vehicle Safety

USG 4887  
November 26, 2019

The Honorable James Owens  
Acting Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

Re: NHTSA Advance Notice of Proposed Rulemaking Federal Motor Vehicle Safety Standard No. 208, Occupant Crash Protection, Docket No. NHTSA-2019-0093

Dear Acting Administrator Owens,

General Motors, LLC (GM) is responding to the Advance Notice of Proposed Rulemaking (ANPRM), to amend Federal Motor Vehicle Safety Standard (FMVSS) 208, "Occupant Crash Protection", that will require a seat belt use warning system for rear seats (hereinafter referred to as a rear seat belt reminder system or RSBR). The ANPRM was published on September 27, 2019 and is seeking comment on a variety of issues related to a potential requirement for a RSBR system.

GM supports the Agency's effort to gather additional information on this subject and contributed in the preparation of, as well as supports, the comments delivered to the NHTSA by the Alliance of Automobile Manufacturers. In addition, we are pleased to submit the following comments.

GM continues to believe seat belt usage by every occupant of a motor vehicle, on every trip, is the most effective way to mitigate injuries and reduce fatalities when involved in a vehicle crash. Recently published field data from the Fatality Analysis Reporting System (FARS) indicates that for fatalities in passenger vehicles with reported restraint use, 58% of rear row fatalities are unrestrained. This data highlights the need for expedient methods to increase rear seat belt usage.

In order to inform drivers of the usage status of the rear seat belts, and enable them to encourage additional rear seat belt usage, GM advocates harmonizing the RSBR requirements with existing requirements contained in UNECE R16-07<sup>1</sup>. We believe that since many manufacturers are currently producing vehicles to meet these requirements, adopting them would be the quickest way to positively influence rear seat belt usage with a RSBR system.

The addition of in-vehicle RSBR systems to address rear seat belt use will take years to populate the vehicle fleet on the road in the United States. Therefore, GM continues to

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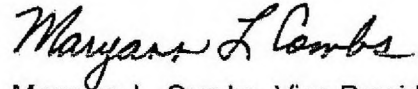
<sup>1</sup> GM does not advocate adopting requirements within UNECE R16-07 which apply RSBR requirements to removable, stowable, swiveling, or suspension seats at this time due to technical issues associated with implementation on these seat types.



encourage public education efforts, and the adoption of additional State legislation to encourage rear seat belt usage.

If you have any questions, or need additional information, please contact Matthew Jerinsky from our Washington office, or me.

Sincerely,



Maryann L. Combs, Vice President  
Global Vehicle Safety

