



Automotive Safety Council

Prevent Protect Notify

December 6, 2019

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor
Room W12-140
Washington, DC 20590-0001

**[Docket No. NHTSA–2019–0093]
RIN 2127–AL37
Federal Motor Vehicle Safety
Standards; Occupant Crash Protection**

Subject: Advance notice of proposed rulemaking (ANPRM) for FMVSS 208: Rear Seat Belt Reminders.

The Automotive Safety Council (ASC) is an industry trade association of 48 of the world's leading suppliers of Autonomous, Crash Avoidance and Occupant Protection automotive safety systems to the automobile industry. The mission of the Automotive Safety Council is to improve the safety of people through-out the world through the development, production and implementation of the latest automotive safety equipment by preventing accidents, protecting occupants and pedestrians when in a collision and to notify emergency responders after the collision when necessary.

The ASC is providing comments to the recently published document requesting comments pertaining to FMVSS 208 on the subject of adding rear seat belt reminders. The ASC appreciates the opportunity to comment on this topic.

General Comments:

ASC supports the initiative to include rear seat belt reminders as a way to increase seat belt usage and protect more lives and that we feel that seat belt suppliers have the necessary hardware/technology to support implementation based on currently known state of the art belt use reminders already in production. Harmonization with Euro NCAP on this subject would be greatly appreciated as vehicle makers already comply with this requirement. We would recommend that copying the current Euro NCAP test protocol would be the most efficient and proven method forward and would not need new engineering by the industry and has a proven track record of working.

In conclusion, the ASC welcomes this opportunity to comment on the potential FMVSS 208 improvements. We welcome any invitation to visit the NHTSA office for a detailed discussion of these comments should the need arise.

Sincerely,

A handwritten signature in black ink, appearing to read "D.P. Campbell". The signature is written in a cursive style with some loops and flourishes.

Douglas P. Campbell
President
Automotive Safety Council