

Comment from Anonymous

Responding to this petition, I would like to point out some contrary opinions that a failed FMVSS test does not compromise safety. School vehicles have the greatest responsibility of transporting our children and as such have always been held to a higher standard of safety. As such, manufacturers of these types of vehicles should be held to a higher standard of compliance with the FMVSS. This FMVSS test is specified and is able to be measured in quantitative results. I see no reason why these vehicles not be subject to recall and subsequent retesting to show conformance with this standard.

In regards to DTNA's position and reasoning:

#1 - The modification performed by DTNA to make the vehicle more "aesthetic" and the modifications constituting a "cosmetic" alteration are the reason why the test failed. The reason for the modifications are irrelevant to the standard and do not change the fact that due to the current design, the vehicle failed the test.

#2 - DTNA references the "purpose" of the standard which does not change the fact that the test failed. I think DTNA is reaching when they claim to know the complete purpose of a standard and all the interwoven variables.

#3 - The argument that the forces in the testing are not the same as those in the real world is an invalid argument. Just because a test may not be "seen" as achievable in the real world, does not mean that the test does not provide a level of substantiation on the build or engineering of the body of the vehicle in safe manner.

#4 - Again, DTNA is referencing that they understand the purpose of the regulation, but they still designed a vehicle that passed this particular safety test.

#5 - DTNA has corrected the issue. They are required to.

#6 - The fact that this seating design has been used for over a decade does not change the fact that the safety test failed.

Bottom line - the FMVSS requires a specified test with specific parameters. DTNA designed a vehicle that was not in compliance with this safety test.