

## Comment from DEVCO Design & Development

Agency/Docket Number: NHTSA-2020-0075

Title: Exemption from Shoulder Belt Requirement for Side-Facing Seats on Motorcoaches

My following comments are as an Industrial R&D Engineer and a very active Automotive Safety Advocate.

All requests of approval for exemption from shoulder belt requirements must not be approved.

Existing safety requirements specify seating capacity and requirements for belting occupants in all seat locations.

It is a critical safety requirement that all seat occupants must be restrained within a controlled safety threshold.

There is more than sufficient proof that all directions of occupant seating must consider all directions of crash safety.

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