

Comment from Nick Terry

I am in favor of the National Highway Traffic Safety Administration's proposed rule to amend Federal Motor Vehicle Safety Standard No. 208 to ensure that child restraint systems (CRS) being used in air bag safety tests are representative of current CRS requirements. Given the importance of child restraint systems, it seems logical that the devices being tested would represent the current models in production and use.

One important criterion to consider when proposing such a change is the costs and benefits associated with the proposal. Section 7 of the supplementary information for the proposed rule change does well in outlining the potential benefits and costs. The chief benefit is the mitigation of the risk of injury to children by testing with child restraint systems that are representative of CRSs in production today. Additionally, updating the CRSs to reflect current requirements could help prevent instances where an advanced air bag system does not recognize or properly interact with a child restraint system during deployment. This rule change would also help manufacturers to design air bag systems that coincide with child restraint systems currently in use. The only cost mentioned in the supplementary information is a minimal monetary cost to update the CRSs used in testing.

In reading this proposed rule change and the supplementary information surrounding it, there does not seem to be a glaring downside or weakness, or any adverse effects from implementing the change. I think it would be in the National Highway Traffic Safety Administration's best interest to institute the change.