

Comment from William Belson III

Bruno Independent Living Aids Inc. supports the NHTSA proposed expansion of the Make Inoperative section part 595.7 to include FMVSS 111 when a PMD transport device is temporarily installed on a vehicle equipped with a FMVSS 111 compliant backup system(s). The conditions that drove Bruno to request this addition to the part 595.7 are more prevalent today than when we submitted the request.

The complications faced by the PMD transport device manufacturers to meet the full FMVSS 111 requirements could add significantly to the cost of the PMD transport device. This is due to vehicle manufactures using a wide variety of different vehicle architectures in the backup systems which requires a high number of low volume applications necessary to support the vehicles PMD users purchase as well as creating additional complexities necessitating extra installation labor. In this industry the vast majority of PMD transport devices are installed by motor repair businesses due to the physical limitations of the end users and the knowledge needed to appropriately adjust the transport devices securing means for the end users PMD. We have determined that complete compliance with FMVSS 111 could increase the cost significantly (in the range of 25 to 30%) to those end users needing the equipment. This is a substantial burden.

This part 595 expansion also provides an avenue for those registered motor repair businesses with an opportunity to provide properly documented aftermarket alternatives mounted on the PMD transport device at a reasonable cost. As we found during our investigations, these may provide many of the benefits but may not meet all the FMVSS 111 requirements.

We support the limitation of not permanently removing the FMVSS 111 compliant backup system, which allows for the vehicle to be returned to original operating condition when the PMD transport device is removed. We feel that this is a good compromise to help those who have special needs to safely transport their PMDs.

We thank NHTSA for consideration and support in addressing the needs for PMD users trying to maintain their transportation independence while living independently.