

Comment from David Jankowiak

The amendment to FMVSS No. 213 entails the simplification of CRSs compliance testing that is "more reflective of the real-world use CRSs today." If "real-world use" includes the unintentional misuse of CRSs it should then encompass this in the compliance testing, if feasible. It stands to reason that a not insignificant number of CRSs are unintentionally misused or improperly installed, therefore to reflect the "real-world use" the tests should include misuse and/or improperly installed CRSs, if feasible.