



December 14, 2020

Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Docket No. NHTSA-2020-0093**

Petition for Reconsideration Regarding Extending The Comment Period 180 Days for the November 2, Federal Motor Vehicle Safety Standards; Child Restraint Systems, Incorporation by Reference” in Order to Allow CRS Manufacturers the Opportunity to Evaluate the proposed regulation and test bench

Dear Administrator,

Thank you for the opportunity to comment on this proposal to introduce a new standard seat assembly and update other aspects of FMVSS No. 213. The Juvenile Products Manufacturer’s Association (“JPMA”) submits the following Petition for Reconsideration of extending the timeframe set in the November 2, 2020 NPRM entitled “Federal Motor Vehicle Safety Standards; Child Restraint Systems, Incorporation by Reference” (Docket No. NHTSA-2020-0093). JPMA petitions that the comment period be extended to 180 days from the date of publication in order to allow JPMA member companies the opportunity to fully evaluate the proposed test bench and evaluate it for repeatability and reproducibility of results with the child restraint models they produce. Additional time is also necessary considering the current need for social distancing, rolling business and restrictions in local areas, the delayed bench drawing package referenced by the NPRM, and the prohibitions against using benches owned by NHTSA for commercial testing, along with holiday delays.

The Juvenile Products Manufacturers Association (JPMA) is a national not-for-profit trade organization representing 95% of the juvenile products industry including the producers, importers, or distributors of a broad range of childcare articles that provide protection to infants and assistance to their caregivers. JPMA exists to advance the interests, growth and well-being of North American prenatal to preschool product manufacturers, importers and distributors marketing under their own brands to consumers. It does so through advocacy, public relations, information sharing, product performance certification and business development assistance conducted with appreciation for the needs of parents, children, our members and their retailer customers. JPMA continues to work with government officials, consumer groups, and industry leaders on programs to educate consumers on the safe selection and use of juvenile products.

JPMA submits this petition with the best interests of the most affected parties in mind. We believe that the timing of this comment period does not adequately reflect the time necessary for manufacturers to thoroughly evaluate the potential implications of the NPRM and to provide constructive feedback to NHTSA regarding the proposed rule. The included changes are extensive, and evaluation requires the fabrication of benches by crash test labs. Fabricators estimate a range of 8 to 16 weeks for benches to be delivered, and

---

**JUVENILE PRODUCTS MANUFACTURERS ASSOCIATION, INC.**

1120 Route 73, Suite 200 • Mt. Laurel, NJ 08054  
TEL: 856.638.0420 • FAX: 856.439.0525  
jpma@jpma.org • www.jpma.org

the drawing package was not published until November 9, 2020. Without the ability to inspect, fully evaluate and conduct comparative testing using this new bench, particularly in regard to its repeatability and reproducibility characteristics, our CRS manufacturing members are seriously limited in their ability to comment in the time period prescribed in the current NPRM.

While a small number of benches already exist, not all of our manufacturers rely on contract testing laboratories to conduct their evaluation testing. Several JPMA manufacturers use their own laboratories to conduct testing, since these labs are commonly used for child restraint development, compliance testing and quality assurance activities, but this cannot be achieved until the benches are fabricated, received and installed. We also understand that benches owned by NHTSA have limited value due to Federal prohibitions against commercial use. As previously discussed and docketed, the industry is also working toward identifying the best method of producing test bench foam that will comply with the regulation and ensure repeatability and reproducibility, and we anticipate resolution during the bench fabrication period.

To demonstrate our commitment to moving forward with proposed improvements to FMVSS 213, JPMA is in the process of determining which parts of the NPRM are already acceptable to the industry. We intend to submit those items to NHTSA in a separate comment prior to the currently published deadline of January 4, 2021.

We urge NHTSA to thoroughly evaluate the merits of this petition and to allow ample time for full evaluation and comment on comprehensive requirements of the NPRM. Like NHTSA, JPMA shares the objective of ensuring that our products meet the highest safety standard while also promoting safe and easy use by the consumer. Please do not hesitate to contact me directly if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'JC', is written over a light yellow rectangular background.

Joseph M. Colella  
Director of Child Passenger Safety, JPMA