



December 31, 2020

Docket Management Facility, M-30
National Highway Traffic Safety Administration
U.S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: Docket No. NHTSA–2020-0093;
Comments by IMMI on NHTSA’s NPRM to Initiate Rulemaking to Amend Federal Motor Vehicle Safety Standard Number 213, “Child Restraint Systems” to Update the Standard Seat Assembly Dynamic Testing Fixture

Dear Sirs:

IMMI would like to thank the National Highway Traffic Safety Administration (NHTSA) for this opportunity to comment on the agency’s proposed amendments for child restraint system standards. The agency’s Notice of Proposed Rulemaking (NPRM) and its proposed guidance was published at Fed. Reg. Volume 85, Number 212 (November 2, 2020).

This proposal, if adopted, would amend Federal Motor Vehicle Safety Standard (FMVSS) No. 213, “Child restraint systems,” by updating the standard seat assembly on which child restraint systems (CRSs) are tested to determine their compliance with the standard’s dynamic performance requirements. In addition, this NPRM proposes to modernize FMVSS No. 213 in some of the standard’s owner registration and labeling requirements and to simplify the standard’s compliance tests. The purpose of this NPRM is to help ensure the continued effectiveness of CRSs in current and future vehicles.

This NPRM serves as an opportunity for NHTSA to seek public comment on these proposed amendments to the child restraint system standard. IMMI is responding primarily to address the proposed change related to School Bus CRSs. As a manufacturer of school bus CRSs and other occupant protection systems, IMMI has much experience with these school bus systems and must address this proposed change. As one of the world’s largest manufacturer of CRS components and with a world class testing facility for both internal and outside customer testing, IMMI will also comment on the other proposed amendments of this NPRM on their impact.

SafeGuard/IMMI Seating Products

IMMI is a leading manufacturer of occupant restraint components and systems for commercial vehicles, off road vehicles, and child passenger systems. In addition, IMMI also manufactures seating systems and child restraint systems for school buses under the SafeGuard brand name. The company has been performing research related to truck and school bus crashworthiness for over 22 years, including full-scale barrier crashes, hundreds of dynamic sled tests, and countless tests using the procedures specified in FMVSS No. 208, No. 210, No. 222 and No. 225.

In 2002, IMMI began to manufacture and sell school bus seats equipped with lap-shoulder belts. This was followed in 2003 with its first add-on school bus specific child restraint system and in 2004 with its first school bus seat with built-in child restraint systems. To achieve acceptance and growth in this market as well as promote proper usage of our systems, IMMI continues to be actively involved with school districts and their transportation services. IMMI supports school bus child passenger safety training sessions. Its customer service and field service representatives work directly with customers to respond to inquiries on solutions to improve usage. These in turn generate opportunities to innovate features in our seat design to increase the user friendliness of our products.

Specific Comments on the FMVSS No. 213 NPRM

A. Updating the Representative Seat Assembly

IMMI performs FMVSS No. 213 dynamic sled testing at its Center for Advanced Product Evaluation (CAPE) barrier crash testing facility in Westfield, IN. This testing is performed to both service any products in their development as well as provide testing services for outside customers. IMMI and CAPE are in full support of the NHTSA proposed seat assembly for future testing. IMMI and CAPE working with Juvenile Products Manufacturers Association (JPMA) and its child car seat manufacturer members in the trials and evaluation of the proposed seat assembly. IMMI and CAPE will concur with industry findings and the resolution agreed on with NHTSA in the publication of the final ruling and update our test sled accordingly.

B. Installing CRSs With a Type 2 Belt Rather Than a Type 1 Belt

IMMI fully supports this proposal based on the reasoning stated in the NPRM.

IMMI does note however, that some current pre-K transportation programs including Head Start programs still choose to use passenger vehicle CRSs rather than school bus specific CRSs in their school buses. In the case of children under the age of two, passenger vehicle rear facing infant seats must be used as there are no school bus specific CRS alternatives. Many current school buses used for pre-K transportation will only have Type 1 belts for the attachment of these CRSs rather than Type 2 belts. IMMI does not believe that this consideration should prevent approval of this proposal.

C. Communicating With Today's Parents – CRS Owner Registration

IMMI fully supports this proposal based on the reasoning stated in the NPRM. IMMI will update Mail-In Registration Cards, Electronic Registration, and information on Labels and Owners' Manuals on its applicable products after publication of the final ruling.

D. Communicating With Today's Parents – Information on Correctly Using CRSs

IMMI fully supports this proposal based on the reasoning stated in the NPRM. This proposal will provide IMMI with greater flexibility to design its labeling to better coordinate with each product application and improve the label effectiveness. IMMI will update Labels and Owners' Manuals on its applicable products after publication of the final ruling.

E. Streamlining NHTSA's Use of ATDs in Compliance Tests To Reflect CRS Use Today

IMMI fully supports this proposal based on the reasoning stated in the NPRM.

F. School Bus CRSs

IMMI fully supports this proposal based on the reasoning stated in the NPRM.

In 2003, IMMI, under the brand name SafeGuard, introduced to the school bus market the first school bus specific child restraint system. The SafeGuard STAR (Student Transportation Add-on Restraint) provided Pre-K school transportation with a solution for a CRS that was easier to properly install on school bus seats than a cam wrap attached harnesses, or a lap belt attached passenger vehicle CRSs. Proper securement could be achieved with the STAR much easier than a harness CRS since the STAR utilized an intuitive 5-point securement system like the ones used in passenger vehicle CRSs. STAR passed all performance test requirements defined by FMVSS No. 213 for both harness and conventional full shell child restraint systems. STAR met all applicable FMVSS No. 213 design requirements for both types of CRSs along with all labeling and documentation requirements. As a result, the STAR and its successors is the leading school bus CRS used in school transportation.

When the STAR was publicly introduced in 2003 at the annual National Association for Pupil Transportation (NAPT) conference, the NHTSA school bus representative strongly applauded the STAR for its innovativeness in meeting an important need of school transportation. In following years, NHTSA continued to recognize the STAR in its various school transportation materials including the NHTSA 8-hour training course on pre-K school transportation securement systems and its own series of training videos on this subject.

This recognition of the SafeGuard STAR by NHTSA as an acceptable child restraint for school bus use was understood by IMMI as an FMVSS 213 application approval. However, IMMI remained unsure about the proper classification of the STAR within FMVSS 213 due to the absence of a full seating shell in the restraint. This questioning increased as other manufacturers introduced competing variations of the STAR for school transportation use.

IMMI appreciates the proposed addition of the “school bus child restraint system” to the definition section of FMVSS No. 213 along with performance standards associated with this new child restraint system classification. The proposal to make the requirements defined in the Standard for this exclusive use on school buses type CRS more design-neutral enables manufacturers to continue development of new and better products that meet the unique needs of school transportation.

IMMI looks forward to this proposed amendment being included in the final ruling of this NPRM for FMVSS No. 213.

G. Proposed Lead Time

IMMI support all lead times associated with the proposed changes defined in the NPRM.

Conclusion

IMMI supports NHTSA’s efforts to advance child passenger safety through the proposed amendments to FMVSS No. 213 in this NPRM.

IMMI recommends that NHTA proceed with all proposed amendments as written with special attention to the proposed addition of a school bus specific child restraint classification to provide direction to the thousands of staff in school transportation that currently use these type CRS’s.

Sincerely Yours,



Charles Vits
Regulatory Affairs Manager
IMMI