



December 28, 2020

Docket Management Facility, M-30
U.S. Department of Transportation,
West Building, Ground Floor, Rm. W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Docket No. NHTSA-2020-0093

Dear Docket Officer:

Thank you for allowing the National Safety Council (NSC) to comment on the National Highway Traffic Safety Administration (NHTSA) notice of proposed rulemaking (NPRM) amending Federal Motor Vehicle Safety Standard (FMVSS) No. 213, "Child restraint systems" (CRS).

NSC is America's leading nonprofit safety advocate and has been for over 100 years. As a mission-based organization, we work to eliminate the leading causes of preventable death and injury, focusing our efforts on the workplace, roadway¹ and impairment. We create a culture of safety to keep people safer at work and beyond so they can live their fullest lives. Our more than 15,500 member companies represent 7 million employees at nearly 50,000 U.S. worksites.

Motor vehicle crashes are a leading cause of death for children from birth to 4 years. While seat belt use is the primary line of defense for occupants in the event of a crash, in-vehicle seat belts are made for adults use.² Correct use of child restraint systems (CRSs) is necessary to mitigate risk for children, and NSC supports ensuring continued effectiveness of CRSs in current and future vehicles.

NSC supports the NPRM efforts to modernize FMVSS No. 213. In particular, NSC is pleased that the NPRM allows flexibility for manufacturers in communicating with parents and caregivers. NSC supports maintaining the current requirement that CRS registration cards state that information collected through the registration process will only be used by the manufacturer for the purpose of contacting the consumer in the event of a recall. Based on first-hand experience conducting car seat checks, NSC subject matter experts believe this is a key notice at the point of decision-making for parents and caregivers in determining if they will submit a recall registration. NSC encourages NHTSA to require manufacturers to bold, highlight or call attention to this statement in some other way given its importance in recall registration submissions.

NSC is also pleased that this NPRM proposes allowing manufacturers leeway to use additional modern and creative means of outreach and information exchange in an effort to increase owner

¹ More information on the work of NSC to keep children safe on the roadway can be found at nsc.org/carseats

² <https://injuryfacts.nsc.org/motor-vehicle/occupant-protection/seat-belts/>

registration rates, as long as the goal continues to be supporting improved registration and recall completion rates. NSC also believes that allowing additional means of outreach and information exchange, including the use of a combination of statements and pictograms, will support health equity.

It has been approximately 30 years since the initial registration card features and standards were crafted. As NHTSA allows increased flexibility regarding CRS registration communications, NSC encourages NHTSA to conduct market research to gather more current feedback from parents and child passenger safety technicians. Data from the [National Digital Car Seat Check Form](#)³ could also assist in understanding challenges today's parents face by providing data to support trends and patterns regarding common CRS misuse. This data could also influence the engineering and design of car seats and vehicles to subsequently increase safety for all vehicle occupants.

Currently, FMVSS No. 213 requires manufacturers to label CRSs with information on the maximum height and weight of the children who can safely occupy each seat. NSC agrees with NHTSA that there is a continued need for this information to be permanently labeled on CRSs. NSC also supports the proposal in the NPRM to require that maximum height and weight information be provided for each mode in which the CRSs can be used (rear-facing, forward-facing, booster). This increased specificity and clarification will likely help reduce the misuse of CRSs and support children remaining in each seating mode for the appropriate amount of time.

NSC aligns with NHTSA in the recommendation that children ages 1 to 3 should ride in rear-facing child restraints as long as possible. NSC strongly supports the NPRM proposal to raise the minimum recommended weight limit from 20 to 26.5lbs for forward-facing seating. In addition to more closely aligning with best practice safety recommendations, increasing the rear-facing weight threshold to 26.5lbs may also reduce some confusion for parents and caregivers when it comes to understanding varying state child passenger legislation in combination with manufacturer recommendations. These proposed weight threshold updates may contribute to organically supporting increased compliance with state laws requiring children to remain rear-facing, forward-facing with a harness, and in booster seats longer. This change may also encourage additional states to update legislation in accordance with best practice safety recommendations, in compliance with the resulting updated manufacturers' instructions.

NSC also aligns with NHTSA in the recommendation that children riding forward-facing should be restrained in CRSs with internal harnesses (car safety seats) as long as possible before transitioning to a booster seat. NSC supports the proposal in the NPRM to raise the minimum weight threshold for booster seat use from 30 to 40 lbs. Raising this weight threshold will reduce the risk of injuries and fatalities among 3-4 year-olds in a motor vehicle crash.

NSC also supports the proposal in the NPRM to make compliance testing of child restraint systems with various test dummies more realistic and reflective of current real-world use of CRSs. Testing of CRSs with the use of lap-and-shoulder belts, rather than lap belts alone, ensures that CRSs are tested considering modern vehicles on the road.

³ www.cpsboard.org/ndcf



In addition to the proposed changes in the NPRM, NHTSA should support increased education, public communications and enforcement efforts regarding the importance of booster seat use for children through age 12. These efforts should also include increased support for the training of Child Passenger Safety Technicians (CPSTs), accommodating for challenges presented by the COVID-19 pandemic. Research has demonstrated that parents and caregivers who work with CPSTs have improved use of car seats, and provide an important resource for parents and caregivers to properly install seats and secure children correctly.

The correct and effective use of CRSs is proven to reduce injuries and fatalities among children during motor vehicle crashes. NSC is pleased to see this effort by NHTSA to update FMVSS No. 213, and looks forward to working with NHTSA to keep our most vulnerable passengers safe.

Sincerely,

A handwritten signature in black ink that reads "Lorraine M. Martin". The signature is written in a cursive style.

Lorraine M. Martin
President and CEO