



Automotive Safety Council

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January 2, 2021

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor
Room W12-140
Washington, DC 20590-0001

[Docket No. NHTSA-2020-0093]
RIN: 2127-AL34
NPRM – FMVSS No.213 Child Restraint Systems

Subject: NPRM regarding amending Federal Motor Vehicle Safety Standard (FMVSS) No. 213, Child Restraint Systems, to modernize the testing, labeling and ATD's used in the standard.

The Automotive Safety Council (ASC) is an industry trade association of 45 of the world's leading suppliers of Autonomous, Crash Avoidance and Occupant Protection automotive safety systems to the automobile industry. The mission of the Automotive Safety Council is to improve the safety of people through-out the world through the development, production and implementation of the latest automotive safety equipment by preventing accidents, protecting occupants and pedestrians when in a collision and to notify emergency responders after the collision when necessary.

The ASC is providing comments to the recently published NPRM regarding amending Federal Motor Vehicle Safety Standard (FMVSS) No. 213, "Child Restraint Systems," to update the child restraint systems testing of the standard (Docket No. NHTSA-2020-0093). The ASC appreciates the opportunity to comment on this topic

General Comments:

The Automotive Safety Council agrees that NHTSA needed to take this action as per congressional MAP-21 mandate and that such action is needed to identify and standardize testing improvements as well as child weight limits for child seats per use application.

Additionally, we hope this NPRM answers and clarifies issues identified by the U.S. House of Representatives Subcommittee on Economic and Consumer Policy Committee on Oversight and Reform Staff Report on Child Booster Seats dated December 10, 2020.

Testing Requirements:

The analysis of the field data where child injuries and fatalities occurred is always the first step in evaluating whether test protocols should be modified or improved to mimic real world results and assure protection of the public. We were pleased to see NHTSA take this approach when considering updating FMVSS 213.

The changing of the ATD per child weight class by seat type makes sense as it represents the real-world usage. Use of the Hybrid III-6YO in place of the HIII-6YO is a welcome change as the HIII is a much better ATD in mimicking human movement, although still falls short in many ways.

We agree with the change to increase the booster seat weight minimum from 30 pounds to 40 pounds as that corresponds with real world statistical data NHTSA produced in conjunction with UMTRI.

We agree that keeping the test speed at 30mph allows for child safety to be maximized for the majority of real-world crashes and applaud NHTSA for using data to make that decision. Evaluating other country testing protocols gave good insight into harmonization and keeps the USA from having onerous requirements that the rest of the world does not see value in using.

Updating the standard seating configuration appears to mimic the field data and allows for the ability to obtain consistent and repeatable test materials. This is very helpful in test repeatability and capacity.

The introduction of the latest Q3 ATD for side impact is a welcome addition as the new ATD should provide for improved injury evaluation over the current testing methods.

Registration Cards:

We are pleased to see any method that can help in obtaining a higher recall participation when needed and agree that the proposed change to registering the child seat should help with that issue.

Alternate Products:

We are pleased to see NHTSA being proactive in evaluating alternate new products such as the inflatable CRS and the Shield CRS systems. These new products need to be thoroughly evaluated before reaching the USA public and be held to the FMVSS 213 requirements as well as other FMVSS standards.

Timing:

The proposed changes to testing protocols are a large endeavor and undertaking to evaluate before making more defined comments on product performance and suggestions. There are hundreds of car seats that need to be tested and evaluated per the new proposed requirements and a limited amount of testing capacity. We feel an extension of an additional 180 days to the response time for this NPRM should be granted to allow for the needed testing to be done, so a more complete response can be made. While we agree with the direction of this NPRM, we feel it is only prudent that a fuller understanding of the impact and any possible revisions identified by detailed testing of each product be completed. Covid 19 issues continue to present difficulties in the efficiency of testing and is a contributor to the request for more timing to evaluate this NPRM.

In conclusion, the ASC welcomes this opportunity to comment on the NPRM regarding amending Federal Motor Vehicle Safety Standard (FMVSS) No. 213, Child Restraint Systems. We welcome any invitation to visit the NHTSA office for a detailed discussion of these comments should the need arise.

Sincerely,

A handwritten signature in black ink, appearing to read "D. P. Campbell". The signature is written in a cursive style with a prominent loop at the end.

Douglas P. Campbell
President
Automotive Safety Council