



Automotive Safety Council

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December 28, 2020

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-2020-0094]

RIN:2127-AL90

**NPRM – Part 571 and 585; Occupant Crash Protection
(Standard No. 208)**

Subject: NPRM regarding amending Federal Motor Vehicle Safety Standard (FMVSS) No. 208, “Occupant crash protection,” to update the child restraint systems (CRSs) listed in Appendix A-1 of 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. 208, "Occupant Crash Protection," to update the child restraint systems (CRSs) listed in Appendix A-1 of the standard (Docket No. NHTSA-2020-0094). The ASC appreciates the opportunity to comment on this topic

General Comments:

The Automotive Safety Council applauds NHTSA for taking this action as it has been apparent for many years that the ability to obtain the obsoleted listed CRS's was difficult and are not representative of the current CRS's being sold to the public. The updated list appears to cover the variety of CRS's offered to the public while not being onerous in testing numbers.

Additionally, we would like to see a standard time frame adopted by NHTSA that requires the list to be updated at a frequency that makes sense in cooperation with the CRS manufacturers model updates to prevent the same issue from arising haphazardly going forward where the list becomes overly obsolete.

In conclusion, the ASC welcomes this opportunity to comment on the NPRM regarding amending Federal Motor Vehicle Safety Standard (FMVSS) No. 208, "Occupant Crash Protection," to update the child restraint systems (CRSs) listed in Appendix A-1. 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 fluid and cursive, with a large initial "D" and "C".

Douglas P. Campbell
President
Automotive Safety Council