



December 28, 2020

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

**Re: Docket No. NHTSA-2020-0094-0001**

Updated child restraint model descriptions to the child restraint systems listed in Appendix A-1 to test the performance of advanced air bag suppression and low risk deployment systems

Dear Administrator,

Thank you for the opportunity to comment on this proposal to update the child restraint models used in FMVSS No. 208 testing. The Juvenile Products Manufacturer's Association ("JPMA") submits the following updates to the models listed in the NPRM, in an effort to improve access to the selected models.

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.

Updates received from child restraint manufacturers and explanatory notes:

**LISTED MODEL**

Britax Allegiance # E9LR4—

Britax B-Safe 35 #E1A72—

Britax Grow with You #E1C19

**SUGGESTED UPDATE**

Britax Allegiance # E1C14—  
(Incorrect model #)

New Model # Placeholder  
(Listed model number will be phased out in early 2021 and replacement model number will be assigned)

Britax Grow with You #E1C44  
(ClickTight model #; E1C44 does not include ClickTight)

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**JUVENILE PRODUCTS MANUFACTURERS ASSOCIATION, INC.**

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**LISTED MODEL**

Cosco Finale #BC121—

Evenflo Generations 352xxxx

Evenflo Medallion 254

Evenflo Right Fit 245

Evenflo Tribute V 379xxxx

Graco 4Ever All-in-1

Graco Backless TurboBooster

Graco Contender 65

Safety 1st Dreamride SE LATCH #IC238—

**SUGGESTED UPDATE**

Cosco Finale #BC110—

(BC121 has limited availability; BC110 is far more widely available)

Evenflo EveryKid 393xxxx  
(Listed model not produced since 2007)

Evenflo SureRide 371xxxx  
(Listed model not produced since 2005)

Big Kid 365xxxx  
(Listed model not produced since 2005)

Evenflo Tribute 381xxxx  
(Listed model not produced since 2009)

Graco 4EVER DLX 4-in-1 Car Seat  
(Currently listed name is for the original version that is only available at Costco)

Graco Turbobooster Backless Booster Seat  
(Corrected and updated name)

Graco Contender 65 Convertible Car Seat  
(Corrected and updated name)

Safety 1st Dreamride with LATCH  
(Correct and updated name no longer includes "SE")

We also urge NHTSA to commit to more frequent updates of this list to ensure that it is current and that it represents the continually evolving child restraint market. Please do not hesitate to contact me directly if you have any questions or concerns.

Sincerely,



Joseph M. Colella  
Director of Child Passenger Safety, JPMA