Memorandum

U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Subject: ACTION: Docket Submission of "Ex Parte Communication with JPMA"

Date: 3/19/21

From: Shashi Kuppa KUPPA
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Date: 2021.03.19 17:22:02 -04'00'
Director, Office of Crashworthiness Standards

To: Docket No. NHTSA-2020-0093

Thru: Dee Fujita
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Date: 2021.03.26 10:55:24 -04'00'
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On October 15, 2020, Joe Colella from the Juvenile Products Manufacturers Association (JPMA) contacted the National Highway Traffic Safety Administration (NHTSA) by requesting additional details on the foam specifications proposed in the notice of proposed rulemaking (NPRM) to update FMVSS No. 213, "Child restraint systems" (85 FR 69388). The NPRM was made available to the public on NHTSA's website on September 24, 2020 (the day the notice was submitted to the Federal Register for publication).[1] Mr. Colella explained that clarification was sought at this time because members are considering investing in a mold to produce the proposed foam with the dimensions in the NPRM in one piece.[2] Below we detail JPMA's questions and the Agency's responses.

1. JPMA was seeking clarification on whether a single piece of foam (no assembly or adhesives) would be acceptable, if it is tested within specifications. JPMA stated that having a bigger mold would eliminate what it saw as a potential for adhesive issues, crash-testing inconsistencies and user errors. *NHTSA responded that the NPRM provides Indentation Force Deflection (IFD) specifications for the foam used on the standard seat assembly and does not have a provision about gluing pieces of foam. In some of NHTSA's research tests, the Agency used two foam parts glued together on the seat back.*

2. JPMA also requested clarification on whether the foam should have skin, and if so which side of the foam should have the skin. JPMA explained that if they build a mold for the foam they can design to have skin or not have skin. *NHTSA responded that the NPRM does not have a provision addressing skin for the foam used on the proposed standard seat assembly. NHTSA also mentioned that the test results in NHTSA's research tests were not significantly different when conducted using foam with and without skin as shown in an already published research report.*[3]

[1] Press Release: https://www.nhtsa.gov/press-releases/major-improvements-child-passenger-safety

[2] The mold Woodbridge currently uses to produce the proposed foam has a smaller size than the seat back foam in the NPRM. Therefore, an extra piece of the proposed foam would need to be glued to the Woodbridge provided foam piece for the seat back.

[3] Wietholter,K., Louden, A., Sullivan, L. "Evaluation of Seat Foams for the FMVSS No. 213 Test Bench." June 2016. *https://www.regulations.gov/document?D=NHTSA-2013-0055-0013*

3. Mr. Colella asked if it was possible to clarify the NPRM by adding these foam options. *NHTSA responded in the negative, and suggested JPMA consider submitting comments to the NPRM's docket on the foam specification.*

Please submit this memorandum to Docket No. NHTSA-2020-0093.