



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Memorandum

Subject: Ex Parte Communication with JPMA

Date:

From: Shashi Kuppa
Director, Office of Crashworthiness Standards

To: Docket No. NHTSA-2020-0093

Thru: Dee Fujita
Acting Assistant Chief Counsel (ACC)

On November 20, 2020, Mr. Joe Colella from the Juvenile Products Manufacturers Association (JPMA) contacted the National Highway Traffic Safety Administration (NHTSA) asking about the foam specifications proposed in the notice of proposed rulemaking (NPRM) to update FMVSS No. 213, “Child restraint systems.” The NPRM was posted on NHTSA’s website on September 24, 2020 (the day the notice was submitted to the Federal Register for publication)¹ and was published on November 2, 2020 (85 FR 69388). Mr. Colella explained that additional clarification was sought at this time because JPMA members are considering investing in a mold to produce the proposed foam. Below we detail Mr. Colella’s questions and the Agency’s responses (in italics).

1. JPMA requested confirmation in the final dimensions for the test bench. *NHTSA responded that the proposed drawings are subject to change. The Agency may receive comments or become aware of other information that may warrant NHTSA’s updating aspects of the proposed test bench, including the foam.*
2. JPMA requested clarification on whether there were any concerns about the WNV (a venting technology) that Woodbridge uses for virtually all foam (for better product consistency and appearance, according to Mr. Colella). JPMA stated that the foam would still meet NHTSA’s Indentation Force Deflection (IFD) specifications. *NHTSA stated that it could not answer this question as the Agency has not tested any foams with WNV venting technology (or a similar technology). NHTSA noted that the proposed specifications neither require nor prohibit these vents.*
3. JPMA asked if NHTSA would be interested in using the resulting foams at VRTC. *NHTSA responded in the negative as the Agency does not see a need to use the foams at this time.*

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

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