



April 5, 2021

*By regulations.gov*

National Highway Traffic Safety Administration (NHTSA)  
Docket Management Facility (M-30)  
West Building, Room W12-140  
1200 New Jersey Avenue, SE  
Washington, DC 20590-0001

Re: Federal Motor Vehicle Safety Standards: Child Restraint Systems; 49 CFR Part 571; Doc. No.: NHTSA-2020-0093

Ladies and Gentlemen:

The National Automobile Dealers Association (NADA) represents more than 16,000 franchised automobile and truck dealers who sell new and used motor vehicles and engage in service, repair, and parts sales. Together they employ over 1,000,000 people nationwide, yet the majority are small businesses as defined by the Small Business Administration.

## **I. Introduction**

Last year, NHTSA proposed to amend Federal Motor Vehicle Safety Standard (FMVSS) No. 213 governing “Child Restraint Systems” or CRS<sup>1</sup> Proposed changes would, among other things, revise CRS compliance test dummies and procedures, increase the weight limit for rear-facing CRS, and lessen restrictions on owner recall registration and CRS labeling requirements. NADA and its members neither manufacture nor certify CRS and thus offer no specific comments on the proposals to update FMVSS No. 213 CRS testing and certification requirements. NADA generally does support changes to FMVSS No. 213 to foster cost-effective safety performance improvements for covered CRS properly installed in vehicles of all types and ages. The following comments and suggestions focus on NHTSA’s proposals related to CRS use and recall.

Motor vehicle dealers are often called upon to advise current and prospective customers on new and used vehicle CRS compatibility and on proper CRS fit and use. A small percentage of dealerships even sell CRS. In addition, it is not uncommon for dealerships to certify CRS “technicians” and to host CRS checkup events for the motoring public.<sup>2</sup> And NADA has actively worked with NHTSA and others to promote child passenger safety to its members.<sup>3</sup>

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<sup>1</sup> 85 Fed. Reg. 69388, *et seq.* (November 2, 2020).

<sup>2</sup> See, e.g., <https://cert.safekids.org/get-car-seat-checked>.

<sup>3</sup> See, e.g., [www.nada.org/CustomTemplates/GeneralPage.aspx?id=21474839131](http://www.nada.org/CustomTemplates/GeneralPage.aspx?id=21474839131).

## **II. Proper CRS Installation and Use**

NHTSA proposes to loosen FMVSS No. 213 labeling requirements to afford CRS manufacturers greater flexibility regarding the effective communication of proper CRS installation and use. The proposal would allow for label information to be provided in statements or a combination of statements and pictograms, and for label location flexibility. NADA supports NHTSA's labelling proposals. Unlike for new motor vehicles where prospective purchasers may have certain expectations regarding standardized safety information location and format, CRS purchasers are unlikely to have such expectations regarding CRS labels. Importantly, added flexibility should serve to help better address the two critical CRS use challenges; proper seat installation and proper child securement. NADA recognizes that CRS manufacturers should continue to be required to provide standardized information on maximum and minimum child height/weight thresholds, on CRS model and date of manufacture, and on other key user information.

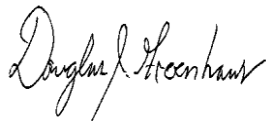
## **III. CRS Recall Effectiveness**

NHTSA also proposes to loosen FMVSS No. 213 CRS owner registration requirements to provide communication flexibility with the aim of increasing registrations for recall notification purposes. Based in part on the experience of its members with the registration of new tires on new motor vehicles and the new tires they sell in their service and used vehicle departments, NADA supports NHTSA's CRS registration proposals. CRS registration rates of 23 percent impede effective CRS recall campaigns. Mail-in registration works for some CRS purchasers and should remain an option, along with email, online, QR and bar code, and other forms of electronic registration. Moreover, to increase recall campaign effectiveness, CRS manufacturers should be encouraged to communicate electronically to their customers (and others).

## **IV. Conclusion**

In addition to its support for NHTSA's proposed labelling and recall amendments, NADA and its members remain committed to assisting caregivers with proper CRS installation and use, and to partnering with NHTSA and other stakeholders on these and other important child passenger safety issues. A suggestion worth considering is for CRS checkups to include outstanding recall checks. On behalf of NADA, I thank NHTSA for the opportunity to comment on this matter.

Respectfully submitted,



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