

Council on Size & Weight Discrimination, Inc.

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Administrator
National Highway Traffic Safety Administration
400 Seventh St. SW
Washington, DC 20590

Dear Administrator:

The Council on Size & Weight Discrimination is a not-for-profit advocacy group that works to ensure fair and equal treatment for people who are larger or heavier than average. As the president of the Council, I am writing to urge you to support Elizabeth Fisher's Petition for an amendment to SEC. 571.209 Standard No. 209, Seat Belt Assemblies. This petition would amend the regulation that requires auto manufacturers to make seat belts to fit only up to the 95th percentile of weights in the US population.

There are two problems with the current regulation. First, the regulation defines the 95th percentile as 215 pounds for an 6-foot tall male. This is very inaccurate, and needs to be updated with reference to the most current statistics on the body size and weight of the US population. As many as 25% of adult women are heavier than this cut-off point, and may not be able to use a standard seat belt.

Second, while it is acceptable for regulations to set an upper limit on standard seat belt lengths, it is **not** acceptable for those regulations to ignore the needs of those who do not fit into those limits. If the NHTSA requires auto manufacturers to make belts up to a certain length, it must also require those manufacturers to provide some mechanism whereby larger people can obtain seat belts to fit them. Two possibilities have been suggested: optional longer seat belts, or separately purchased extenders.

My organization hears from many larger people about the difficult time they have in public and private accommodations. We receive countless requests for resources for seat belt extenders. In some cases, we are able to tell people to go to their auto dealer. But many manufacturers, including Subaru, Saab, and American Honda refuse to provide or sell seat belt extenders. A larger person who buys one of these cars has no way to buckle up, has no protection in a crash, and is unable to comply with the seat belt use law that is on the books in virtually every state in the US.

The NHTSA teaches that seat belts save lives. I urge you to change the regulations so that larger people are included in those whose lives you are trying to protect.

Thank you for your attention to this matter. Please let me know of your agency's decisions and actions so that I can report them to our constituency.

Sincerely,

Miriam Berg, President

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TRAFFIC SAFETY ADMIN.

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Council on Size & Weight Discrimination, Inc.

Mission Statement: The goal of the Council on Size and Weight Discrimination is to end discrimination based on body size by influencing public opinion and policy.

How we achieve our mission: The Council chooses projects according to their importance in achieving our mission. As new needs arise, new projects are born. We also provide mentoring and guidance to individuals and groups, and serve as a clearinghouse for resources and information. Some of our specific projects are:

The Media Project: Television shows portray large sized characters in a variety of ways: some positive, some neutral, and, unfortunately, many negative. This project seeks to educate the public as well as the writers and producers of those shows, and argues for commonsense guidelines for the elimination of inappropriate size-prejudiced humor.

The Medical Advocacy Project: Through public testimony, letter writing campaigns, and representation on national committees and task forces, The Council presents the perspective of the larger-than average health consumer. We advocate for the principle that scientific research on obesity should be conducted without funding from diet drug manufacturers. Our testimony to the NIH resulted in recognition, in the NIH's 1992 report on weight-loss, of the effects of size discrimination in this country.

International No Diet Coalition: The Council maintains a database of over 200 organizations, and over 500 professionals and activists, who have endorsed the International No Diet Coalition. The Coalition's goals are to protest our culture's obsession with dieting and thinness, to educate health care workers to stress health rather than weight loss for its own sake, and to celebrate the diversity of body sizes in our society.

Kids' Body Image: In order to address the epidemic of chronic dieting, eating disorders, and body image distortion and obsession, the Council develops and runs workshops to help children and teenagers deal with problems of body image, and provides guidelines and information to others working in the same area.

Attorney Referral: The Council provides information and referral to those who have experienced discrimination based on size, including referral to attorneys who have litigated such cases, and who have particular expertise in this area.

Research: The Council makes available bibliographies in many areas of size acceptance, the non-dieting "Health at Any Size" movement, and eating disorder prevention, and treatment. We maintain a database of individuals and groups, and a comprehensive annotated bibliography containing over 150 references to books, articles, and periodicals.