

August 31, 2022

The Honorable Steven Cliff
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Agency Information Collection Activities; Notice and Request for Comment;
Consolidated Child Restraint System Registration for Defect Notifications and
LabelingNHTSA-2022-0042**

Dear Administrator Cliff,

On July 26, 2022, the National Highway Traffic Safety Administration (NHTSA) published in the Federal Register a Notice and request for comments on a request for extension of a currently approved information collection of information on child restraint systems (CRSs). (the “Notice”). The National Association of Mutual Insurance Companies (“NAMIC”) welcomes the opportunity to respond to this request for comments.

NAMIC is the largest property/casualty insurance trade group with a diverse membership of more than 1,500 local, regional, and national member companies, including seven of the top 10 property/casualty insurers in the United States. NAMIC members lead the personal lines sector representing 55 percent of the auto market. Through our advocacy programs we promote public policy solutions that benefit NAMIC member companies and the policyholders they serve and foster greater understanding and recognition of the unique alignment of interests between management and policyholders of mutual companies.

The information collection in the Notice provides that manufacturers of child restraint systems (CRSs): (1) produce registration cards, labels, and printed instructions (brochures), (2) collect CRS owner registration information, and (3) create and keep registration records so that, in the event of a safety recall, manufacturers can provide direct notification to owners.

Child restraint manufacturers are required to provide an owner's registration card for purchasers of child safety seats in accordance with title 49 of the Code of Federal Regulations (CFR), part 571—section 213, “Child restraint systems.” Child seat owner registration information is retained in the event that owners need to be contacted for defect recalls or replacement campaigns. Chapter 301 of

title 49 of the United States Code specifies that if either NHTSA or a manufacturer determines that motor vehicles or items of motor vehicle equipment contain a defect that relates to motor vehicle safety or fail to comply with an applicable Federal Motor Vehicle Safety Standard, the manufacturer must notify owners and purchasers of the defect or noncompliance and must provide a remedy without charge. NAMIC takes the position that increasing CRS registrations can be an important part to protecting young children and infants. By registering CRSs, product manufacturers will be able to directly contact owners in the event of any safety recalls.

As detailed in the Notice, child restraint manufacturers are also required to provide printed instructions in a brochure containing step-by-step information on how the restraint is to be used. Each child restraint system must also have a permanent label. A permanently attached label gives “quick look” information on whether the restraint meets the safety requirements, recommended installation and use, and warnings against misuse. CRSs equipped with internal harnesses to restrain children, and with components to attach to a child restraint anchorage system, are also required to be labeled with a child weight limit for using the lower anchors to attach the child restraint to the vehicle. The child weight limit depends upon the weight of the CRS.

CRS manufacturers are required to label each CRS and provide brochures with safety information and instructions on the proper use of the restraint. NAMIC believes that the effectiveness of these child safety systems is diminished if they are not properly used and that the labeling detailing proper use is important to ensure safety. Such information would mitigate the risk of misuse and consequently reduce injuries to and fatalities of children in crashes.

The Notice requests comments on whether the proposed collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility. NAMIC is supportive of the Notice as another positive step in the possible range of safety data collection and reporting. NAMIC applauds the Notice as a worthwhile action by NHTSA, and strongly urges NHTSA to consider proposing more wide and extensive auto safety data recording and reporting.

If you have any questions or require further information, please contact me at tkarol@namic.org. Thank you for your time and consideration.



Thomas J. Karol

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National Association of Mutual Insurance Companies