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September 26, 2022

National Highway Traffic Safety Admin.
U.S. Department of Transportation
Attn: Administrator
1200 New Jersey Avenue SE
Washington, DC 20590

**VIA ELECTRONIC SUBMISSION
WWW.REGULATIONS.GOV**

Re: Docket No. NHTSA-2022-0042
Agency Information Collection Activities; Notice and Request for Comment;
Consolidated Child Restraint System Registration for Defect Notifications and Labeling

Dear Administrator,

The National Highway Traffic Safety Administration (“NHTSA”) invited the public to comment on the above Docket No. NHTSA-2022-0042 relating to Consolidated Child Restraint System Registration for Defect Notifications and Labeling. Evenflo Company, Inc. and Columbus Trading-Partners USA, Inc., the United States distributor for Cybex (collectively the “Companies”), appreciates the opportunity to provide comments.

The summary of information collected, invited public comments, and responses follows.

Summary of the Collection of Information:

This information collection 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.

Public Comments Invited:

You are asked to comment on any aspects of this information collection, including

(a) 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;

Response: The proposed collection of information is necessary in the event of a recall.

(b) the accuracy of the Department’s estimate of the burden of the proposed information collection;

Response: NHTSA's estimate of the total cost burden appears high, but also fails to take into consideration the cost of postage.

(c) ways to enhance the quality, utility and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including the use of automated collection techniques or other forms of information technology.

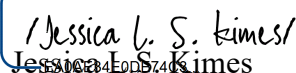
Response: Permitting companies to use QR Codes on child restraints and child restraint packaging that contains all relevant information required for registration would improve the quality of child restraint data being entered into an online registration form by reducing transcription errors that currently occur with paper forms. To register the child restraint the consumer would scan the QR code and be taken to the registration page where the child restraint and model number would automatically populate. Collection of registration information electronically is the most cost-effective collection method for Manufacturers. This saves manufacturers time from collecting, storing, and managing paper Registration Cards and postage of the Registration Cards. Permitting QR codes to link to online registration forms is not suggested as a replacement to paper registration, but as a cost-effective and efficient alternative registration option.

Additionally, permitting registration forms to collect consumer telephone numbers linking a registration to a mobile phone number would increase the number of consumers who could be contacted in the case of a recall. While many consumers change addresses after registering a consumer product, few re-register at the new address. However, most consumers maintain the same mobile phone number after relocation. Being able to contact consumers via a telephone call or text message would increase the effectiveness of recall communications.

Please feel free to contact me at Jessica.Kimes@goodbabyint.com, if any questions.

Sincerely,

DocuSigned by:


Jessica L. S. Kimes