

# Memorandum



U.S. Department of Transportation  
**National Highway Traffic Safety  
Administration**



Subject: Docket Submission of Meeting with  
Juvenile Products Manufacturers Association (JPMA)

From: Stephen Summers  
Office Director  
Office of Vehicle Crash Worthiness

To: Docket Numbers: NHTSA-2013-0055, NHTSA-2020-  
0093, NHTSA-2014-0012, and NHTSA-2014-0123

Through: Terrence Sommers  
Assistant Chief Counsel  
Vehicle Safety Standards and Harmonization

Date:

On May 12, 2022, at the Juvenile Products Manufacturers Association's (JPMA) request, National Highway Traffic Safety Administration (NHTSA) staff met with representatives from JPMA in-person and through the ZoomGov web-conferencing application. The meeting involved various issues of interest to the JPMA membership. A copy of the agenda is attached to this memorandum. Due to time constraints, the attendees did not discuss the following agenda items in any significant detail: *9. Compliance database updating plans and utility, 10. Status: Past interpretation requests still unresolved, and 11. NHTSA efforts to prevent sale of noncompliant car seats.*

JPMA began the meeting by requesting an update on various regulatory actions. NHTSA staff responded by stating that the regulatory agenda will likely be updated soon, and it will contain new dates on pending rulemakings. JPMA also had questions about specific regulatory actions, but NHTSA was not able to share information on future actions.

A JPMA member presented the results and conclusions of their foam testing series. See the attached file titled, "*Industry FMVSS 213 NPRM Research for JPMA - FINAL - 5-12-2022.*" NHTSA staff did not comment.

JPMA members asked NHTSA staff about the NHTSA's recent concentration on boosters. NHTSA staff were unable to comment on the pending legislation for side impact, but NHTSA staff stated that NHTSA will continue to publish booster-related research via the dockets or National Transportation Library. One JPMA member presented their company's user instructions to ensure appropriate head clearance between the child occupant and the ceiling. See the attached file titled, "*Dorel 5 Inch Headroom Requirement NHTSA - 5-12-2022.*"

The next topic was Ease of Use ratings. NHTSA staff stated that NHTSA publishes Ease of Use ratings in batches, but NHTSA is exploring different publishing options that may be more timely.

NHTSA staff requested that JPMA members reach-out if JPMA is aware of results that aren't published.

Then, JPMA members and NHTSA staff discussed the Bipartisan Infrastructure Law (BIL). The JPMA membership was concerned that NHTSA may be intending to apply rulemaking to aftermarket products. Additionally, JPMA members were concerned about recent bills in state legislatures. NHTSA staff responded that any federal rulemaking actions would be published via Regulations.gov.

JPMA asked NHTSA how NHTSA intends to respond and potentially harmonize with Transport Canada's compression / deflection testing. NHTSA staff stated that they are unable to comment on pending or future regulatory actions, but NHTSA is working to harmonize some of the Child Passenger Safety (CPS) training materials.

NHTSA staff described NHTSA's plans for CPS Week engagement, including media and educator materials via <https://www.trafficsafetymarketing.gov/>.

JPMA members stated that they are concerned with state laws creating a patchwork regulatory environment with respect to flammability which may allegedly introduce unintended consequences. NHTSA staff stated that NHTSA published a flammability report last year, but we are continuing our research into FMVSS No. 302.

Please submit this memorandum to Docket No. NHTSA-2013-0055, NHTSA-2020-0093, NHTSA-2014-0012, and NHTSA-2014-0123.

The following is a list of meeting attendees from NHTSA and JPMA. It includes individuals who attended the meeting in-person and virtually. There were technical difficulties in recording the virtual attendance of some NHTSA personnel, so the list of NHTSA personnel may not be complete.

**NHTSA Attendees:**

- **Katherine Chasins**, General Engineer, NRM
- **Claudia Covell**, Safety Compliance Engineer, NEF
- **Laura Dunn**, Highway Safety Specialist, NPD
- **Cristina Echemendia**, Special Vehicles and Systems Divisions, NRM
- **Ian Hall**, General Engineer
- **Shashi Kuppa**, Division Chief, Special Vehicle and Systems Division, NRM
- **Peter Martin**, Chief of Structures and Restraints Research
- **James Myers**, General Engineering, NRM
- **Ryan Posten**, Associate Administrator of Rulemaking
- **Leah Scully**, Highway Safety Specialist, NPD
- **Patrick Smith**, General Engineer
- **Kedryn Wietholter**, Research Engineer, Vehicle Research Test Center
- **Corey Barlet**, General Engineer, NEF

**JPMA Attendees:**

- **Zachary Bertram**, Managing Director, IMMI
- **David Campbell**, Sr. Advisor/ Founder, DECA Consulting, Inc.
- **Joseph Colella**, Director of Child Passenger Safety, JPMA
- **Tara Cozier**, Principal Engineer – Product Safety & Compliance – Car Seats, Newell Brands
- **Dan DeSimone**, Digital/Ecommerce Product Manager, Dorel Juvenile
- **Eric Dahle**, Director of Engineering and Product Safety, Evenflo
- **Tim Edwards**, Sr. Manager of Lab and Regulatory Compliance, Dorel Juvenile
- **Kendal Fowler**, Director of Product Development and Testing Center – Car seats Baby Division
- **Vera Fallaway**, Product Development and Improvement Consultant, Customer and Advocate Relations Manager, Safety Traffic System
- **Joshua Gazaway**, Associate Engineer, Graco Children’s Products
- **Steve Gerhart**, Vice President, Product Development, Nuna
- **Jon Gondek**, Director, Sled Testing, Calspan Corporation
- **Curt Hartenstine**, Chief Development Officer, Iron Mountains
- **Sarah Haverstick**, Safety Advocate, Evenflo
- **Tanya Hiday**, Coalition Coordinator, Safe Kids Coalition
- **Darrin Keiser**, Vice President-Global Quality and Advanced Development, Dorel Juvenile
- **Jessica Kimes**, Vice President and General Counsel, Goodbaby International
- **Randy Kiser**, Senior Manager, Ethics, Compliance and Safety, Newell Brands
- **Kathryn Kuwik**, Senior Director and Associate General Counsel, Goodbaby International
- **Lisa LeBlanc**, Quality and Compliance Director, UPPAbaby
- **Julia Lentini**, Quality and Compliance Professional, Britax Child Safety
- **Elliott Levy**, Quality Assurance Manager, Dorel Canada
- **Jody Malone**, CPST, BabyTrend
- **Kyle Mason**, Senior Design Engineer, Iron Mountains LLC
- **Brad Mattarocci**, Vice President, Baby Trend
- **Jake Mitchell**, Engineering Manager – Car Seats, Newell
- **Keith Nagelski**, Engineering Leader, Britax Child Safety
- **Jonathan Otero**, Child Passenger Safety Technician, Orbit Baby
- **Greg Parks**, Director of Compliance, Diono
- **Joel Peterson**, Compliance and Quality Manager, Artsana USA
- **Phillip Przybylo**, Vice President – Child Safety, CYBEX
- **Allison Schmidt**, Lead Scientist – Safety Research and Testing, Britax Child Safety
- **Mitchell Shellenberger**, Journey Innovation
- **Bob Wall**, Global Car Seat Safety Advocate, Nuna
- **Dan Well**, Business Development Manager, Calspan Co.

**Attachments:**

- Agenda - NHTSA Meeting 5-12.pdf
- Industry FMVSS 213 NPRM Research for JPMA - FINAL - 5-12-2022.pdf
- Dorel 5 Inch Headroom Requirement NHTSA - 5-12-2022.pdf