## September 11, 2023

**From:** Stephen Summers

Director, Office of Vehicle Crashworthiness Research

Vehicle Safety Research

**Through:** Deirdre Fujita

Office of Chief Counsel

**To:** Docket Numbers NHTSA-2013-0055, NHTSA-2020-0093,

NHTSA-2014-0012, and NHTSA-2014-0123

**Subject:** Summary of Meeting with JPMAonJune 14, 2023

**SUMMARY**

On June 14, 2023, at the Juvenile Products Manufacturers Association’s (JPMA) request,[[1]](#footnote-2) National Highway Traffic Safety Administration (NHTSA) staff virtually met with representatives from JPMA. The meeting involved various issues of interest to the JPMA membership. A copy of JPMA’s agenda is attached to this memorandum.

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:

Kelley Adams-Campos, Alexander Ansley, Corey Barlet, Colleen Bendig, Marietta Bowen, Claudia Covell, Taylor Collins, Jenny Dang, Cristina Echemendia, Matthew Filpi, Dee Fujita, Jeremy Gunderson, Natasha Iwegbu, Ian Hall, Thomas Healy, Stephen Hench, Kerry Kolodziej, Paloma Lampert, Mai-Lan Lee, Allison Louden, Peter Martin, Jeff Quandt, Leah Scully, Paul Simmons, Christina Smith, Kedryn Wietholter, and Sharon Yukevich.

JPMA Attendees: Andrea Agrati, Scott Anderson, John Bachner, Zach Bertram, Christine Campbell, Corey Campbell, Mario Casiraghi, Joe Colella (JPMA), Tara Cozier, Kegan Crawford, Eric Dahle, Dan Desimone, Anna Early, Tim Edwards, Cory Everman, Kendal Fowler, Paul Gaudreau, Steve Gerhart, Jonathon Gondek, Curt Hartenstine, Sarah Haverstick, William Horn, Jonathan Judge, Darrin Keiser, Jessica Kimes, Randolph Kiser, Kathryn Kuwik, Mark La Plante (Graco), Lisa LeBlanc, Elliott Levy, Rick Locker, Jody Malone, Kyle Mason, Brad Mattarocci, Sean McLaughlin, Steve Oltman, Greg Parks, Nicolas Perego, Joel Peterson, Phil Przybylo, Rebecca Ruthrauff, Chad Sparling, Will Thompson, Sarah Tilton, Charlie Vits, and Daniel Wells.

Summary

JPMA began the meeting by discussing several of what it called “lessons learned” from Federal Motor Vehicle Safety Standard (FMVSS) No. 213a side impact testing conducted by Child Restraint System (CRS) manufacturers and research labs. The lessons learned included various topics like, abdomen insert, arm placement, honeycomb, sled construction, and the pulse corridor. Later, a JPMA member presented its ideas for a new arm positioning procedure, attached as a presentation entitled, “*Arm Detent Procedure Revision 1.*”

For the second topic, JPMA noted potential manufacturer concerns with the FMVSS No. 213 front impact draft test procedure, including questions about data truncation. As FMVSS No. 213 is an active rulemaking, NHTSA staff did not comment except to note that the issues were raised in comments to the docket, and that NHTSA will be responding to the comments in the final rule.

For the third topic, JPMA expressed interest in providing input to developing the NHTSA Office of Vehicle Safety Compliance (OVSC) Test Procedures (TP). In response, Claudia Covell (OVSC) indicated that NHTSA plans to post the FMVSS No. 213a TP soon on the web and that her team is interested in possibly gathering feedback from all interested stakeholders on the TP by way of a public meeting or workshop. However, NHTSA staff reinforced that, while this is something we are interested in doing, no decision has been made on the matter. In addition, NHTSA reinforced that the OVSC TP is a contractual document between OVSC and the OVSC test lab contractor and that any information concerning FMVSS No. 213a instructions included in the OVSC TP fall within the boundaries of the FMVSS No. 213a language. NHTSA staff emphasized that FMVSS No. 213a is currently published so manufacturers can work toward self-certification of their products to the published new requirements.

The fourth topic involved non-compliant, non-domestic, and counterfeit products.[[2]](#footnote-3)  NHTSA staff noted that non-safety-related counterfeits (e.g., intellectual property disputes) are outside of NHTSA’s mission. For those intellectual property disputes, NHTSA staff recommended that JPMA members contact the Department of Commerce.[[3]](#footnote-4) For safety-related complaints, NHTSA staff noted that JPMA members may submit a complaint to NHTSA through a Vehicle Owner's Questionnaire. (VOQ) or through NHTSA’s website.[[4]](#footnote-5)

The fifth topic involved the timely publication of NHTSA test reports. NHTSA staff stated that the passing reports and reports for which issues have been resolved have been posted, and as issues in other reports are resolved, they too will be posted. NHTSA staff took an action to verify no technical issues were occurring with the publication of the reports on the website.

The next topic discussed potential harmonization efforts between the U.S. and Canada. JPMA offered to work with NHTSA and Transport Canada to harmonize both physical testing and Child Passenger Safety Technician (CPST) training. NHTSA staff noted that NHTSA continues to coordinate with Transport Canada on rulemaking to the extent possible, and that we are working with Transport Canada regarding the current CPST training materials.

In the seventh topic, JPMA requested an update on the NHTSA Ease of Use and Car Seat Finder databases. NHTSA staff noted that we are aware of JPMA members’ concerns, and we are working on those issues. NHTSA staff further confirmed that once NHTSA has an update, we will communicate the update to JPMA.

In the eighth topic, JPMA requested an update on NHTSA’s flammability research.[[5]](#footnote-6) NHTSA staff noted that NHTSA is still working on the fundamental research, and NHTSA does not have anything else to share at this time. In terms of process, the current research project will end this calendar year. In the future, NHTSA will share information when the agency is ready, as appropriate.

The last topic involved a couple of “walk-in” items. NHTSA discussed activities relating to Child Passenger Safety week. NHTSA staff noted that a recently published report on child safety in unconventional vehicle seating configurations may be of interest to JPMA members.[[6]](#footnote-7) NHTSA staff also stated that the Spring 2023 Unified Agenda of Regulatory and Deregulatory Actions had been recently published.[[7]](#footnote-8)

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

Attachments:

* JPMA Meeting Agenda.
* “Arm Detent Procedure Revision 1.”

1. JPMA has requested and NHTSA has agreed to this yearly meeting for a number of years. [↑](#footnote-ref-2)
2. This is a recurring topic at the meetings. [↑](#footnote-ref-3)
3. Information on intellectual property protection can be found through the Department of Commerce via [www.STOPfakes.gov](https://www.stopfakes.gov/welcome). [↑](#footnote-ref-4)
4. The public can submit safety-related complaints via NHTSA’s website at <https://www.nhtsa.gov/report-a-safety-problem#index>. [↑](#footnote-ref-5)
5. This is a recurring topic at the meetings. [↑](#footnote-ref-6)
6. Hu, Jingwen et al. (2023). A Modeling Study on Child Occupant Safety With Unconventional Seating Configurations. Report available via <https://rosap.ntl.bts.gov/view/dot/67193>. [↑](#footnote-ref-7)
7. See the Department of Transportation’s Agency Rule List for more information via [www.RegInfo.gov](https://www.reginfo.gov/public/do/eAgendaMain?operation=OPERATION_GET_AGENCY_RULE_LIST&currentPub=true&agencyCode=&showStage=active&agencyCd=2100&csrf_token=BB63E9B6B39A18E4D9D7A8BD7C0511654734EB9DDD75B05E94BCFE6BDA972C8209CD57B64B6BDB4E1EA735571C5BFC274098). [↑](#footnote-ref-8)