



U.S. Department
of Transportation

Memorandum

**National Highway
Traffic Safety
Administration**

Subject: **INFORMATION**: Ex Parte Meeting
with International Electronics & Engineering S.A. (IEE)
about the Seat Belt Reminder Systems NPRM

From: Shashi Kuppa
Director
Office of Crashworthiness Standards

To: Docket No. NHTSA-2023-0032

Thru: Terrence Sommers
Assistant Chief Counsel
For Vehicle Standards & Harmonization

NHTSA met with representatives of IEE on October 26, 2023, to discuss their feedback on the Notice of Proposed Rulemaking (NPRM) to amend Federal Motor Vehicle Safety Standard No. 208, "Occupant crash protection," to require seat belt warnings for rear seats and front passenger seats and enhance the requirements for front seats.

Their presentation reiterated the points made in their comment submitted in response to the NPRM, with an emphasis on the NPRM's rear seat belt reminder system occupancy criteria. Specifically, they are concerned that the NPRM requirements would force vehicle manufacturers that are implementing systems with occupant detection currently to revert to a positive-only SBRS, because "today's state-of-the-art" sensors cannot satisfy the proposed occupant detection criteria. IEE thus suggests that NHTSA define the 5th percentile female as the detection criterion for the rear seat. They also expressed their support of the proposed compliance options requiring occupant detection because they would provide better information and would be more effective than "positive only" systems.

A list of meeting attendees is provided below, and a redacted copy of the presentation provided during the meeting is attached.

Attendees:

In-person

- Steven Summers (NHTSA)
- Natalia Leszczyszyn (NHTSA)
- Holger Lorenz (IEE)
- Jeff Stover (IEE)

- Thierry Mousel (IEE)

Virtual

- Thomas Kang (NHTSA)
- Shashi Kuppa (NHTSA)
- John Piazza (NHTSA)
- Carla Rush (NHTSA)
- Ian Hall (NHTSA)