

Q6: *How much will child seats increase in price as a result of this rule? How much will vehicle prices increase?*

A6: The additional cost that consumers will have to spend on a new child seat will be as low as \$15. (Typically, child safety seats range in price from \$50 to \$100). The vehicle additional cost is between \$3 and \$7.

Q7: *Does this rule support international harmonization?*

A7: The upper tether anchorage requirement is harmonized with Canada and Australia, who have a long history of using upper tethers on child safety seats. The lower anchorages are harmonized with anticipated European and Canadian regulations.

Q8: *What are the positions of vehicle and child seat manufacturers?*

A8: Essentially all vehicle manufacturers strongly support the use of a rigid fixed 1-inch bar system. Essentially all child seat manufacturers now prefer the 1-inch bar system of the final rule.

Q9: *What previous efforts were taken to address this problem?*

A9: On October 13, 1993, the Federal vehicle occupant protection standard was amended to require, effective September 1, 1995, that vehicle lap belts on new passenger vehicles be lockable without a locking clip to tightly secure child seat. However, excessive movement of child seat and child occupant still often results.

Voluntary industry guidelines were developed by the Society of Automotive Engineers, but have not proven to be sufficient to solve the problem of assuring compatibility between the vehicle seat belts and child seats.

In February 1995, the agency set up a Blue Ribbon Panel of experts to recommend ways to install and use child safety seats. In May 1995, the Panel recommended the evaluation and development of a universal system to attach child safety seats.

Q10: *What other recent efforts has the agency taken on child safety?*

A10: On November 19, 1998, the Blue Ribbon Passenger Safety Panel: *Protecting the Forgotten Children* was announced. The mission of the Panel is to recommend strategies to increase the use of booster seats for children 4 to 8 years and the use of seat belts for children 8 to 16 years. This group of children typically is currently not covered by state child seat use laws. Children of this age group have low restraint use rates and a high fatality rate; resulting in motor vehicle crashes being the leading cause of death for this age group.

FACT SHEET

UNIVERSAL CHILD SAFETY SEAT ATTACHMENT SYSTEM

Current Child Safety Seats Problem

- Annually, motor vehicle crashes result in 600 child fatalities and 70,000 injuries for children less than five years old. Even though child safety seats are very effective in reducing death and injury, in actual use their effectiveness is substantially reduced due to incorrect use and occasional incompatibility with the vehicle seat and belt systems.
- Parents are generally dissatisfied with the current vehicle belt system for attaching child seats because of the complexity and difficulty to tighten the child seat.

Previous Efforts to Remedy the Problem

- The Federal vehicle occupant protection standard was amended on October 13, 1993, to require that vehicle lap belt be lockable to tightly secure child seats. However, excessive movement of child seat and child occupant still often results.
- Voluntary industry guidelines were developed by the Society of Automotive Engineers, but have not proven to be sufficient to solve the problem of assuring compatibility between vehicle seat belts and child seats.
- In February 1995, the agency set up a Blue Ribbon Panel of experts to recommend ways to install and use child safety seats. In May 1995, the Panel recommended undertaking an evaluation and development of a universal system to attach child safety seats.
- President Clinton's February 15, 1997 radio address announced a proposal to require motor vehicles and child restraints to be equipped with a standardized means independent of vehicle safety belts for securing child seats to the vehicle seats.

Received Public Comments

- Over 70 comments were received in response to the rulemaking proposal. Because the international community is considering adoption of a standard for a universal, independent child seat anchorage system, comments were also received from foreign governments as well as domestic entities.
- All commenters agreed with the need for a universal independent child seat attachment system.

New Universal Child Restraint Safety System

- The system is universally compatible with all passenger cars and light trucks and is also universal in terms of its potential for international adoption.
- Typically, vehicles will be required to install 2 systems in the rear seat. Each system will consist of a ready-to-use, visible and accessible upper anchorage to which the child seat tether hardware will attach. The vehicle seat will have two, 1-inch long bars spaced a foot apart and positioned where the vehicle seat cushion and seat back meet, to which the child seat lower hardware attaches.
- New child seats will be required to have this new system, and also remain installable with regular vehicle seat belts (to assure compatibility with older vehicles).
- The expected child benefits are up to 50 deaths and 20,000 injuries prevented per year

once these systems become widespread. The added costs to consumers are as low as \$15 for a new child seat and \$3-7 per vehicle.

Starting September 1999, the majority of new model vehicles will be equipped with top tether attachment points. By September 2002 all new vehicles will be equipped with the complete system.

PRESIDENT CLINTON ANNOUNCES NEW RULE TO IMPROVE SAFETY OF CHILDREN IN VEHICLES

February 27, 1998

In his radio address today, President Clinton will announce a major step to protect our traveling children -- a new rule requiring a single standardized system for installing child safety seats in cars and light trucks. The rule will make it much easier for parents to install child seats by creating a universal method for attaching the seats, and requiring cars and light trucks seats to be compatible. Under the rule, each new child seat will have three attachments -- one on top and two at the base. All new cars and light trucks will required to be equipped with standard anchors in the back seat designed specifically to link to the child seat attachments. The rule, ~~to be~~ ^{for} implemented by 2002, is expected to prevent as many as fifty child deaths and 20,000 injuries each year.

New Rule Makes Installation Easier and Will Save Lives

Currently, installing a child safety seat is complicated by the fact that there are over a hundred of models of child seats requiring many different methods for installation in over 900 models of passenger cars now on the road. Moreover, not all models of car seats fit in all models of passenger cars. Even when child seats do fit, the current method uses the vehicle seat belts to install child seats, a cumbersome process because seat belt designs are built for adult protection not child seat installation. The result is that up to 80 percent of children strapped into safety seats are at risk because those seats are improperly installed.

How the New System Works

For the child safety seats, there will be three attachments, a tether on top and two at the base. For vehicles, new standard anchors will be installed in the back seat which are designed to link to the new child seat attachments. Typically, vehicles will be required to install 2 systems in the rear seat so that two child seats can be anchored. Each system will consist of a ready-to-use, visible and accessible upper anchorage to which the child seat tether hardware will attach. The vehicle seat will have two one-inch long bars spaced a foot apart and positioned where the vehicle seat cushion and seat back meet to which the child seat lower hardware will attach.

Effective Date of Rule for Vehicles and Child Seats

For vehicles, eighty percent of new cars will be equipped with the top tether attachment points starting September 1, 1999. All new vehicles (cars and light trucks) will be equipped with the top tether attachment points by September 1, 2000. The lower anchorages are phased in over 3 years, covering 20% of vehicles by September 1, 2000, 50% of vehicles by September 1, 2001, and all vehicles after September 1, 2002.

For the child seats, starting September 1, 1999, all new child seats will be equipped with an upper tether. All new child seats will be equipped with the two lower attachments by September 1, 2002. New child seats will also remain installable with regular vehicle seat belts to assure compatibility with older vehicles and aircraft.

2/

Builds on the President's Efforts to Protect Children in Vehicles

This step is on/of a series of actions by President Clinton to promote safety for children on the road. Two years ago, on February 15, 1997, the President announced the proposed rule regarding child safety seats in his weekly radio address. Today's announcement reflects comments the Department of Transportation received in order to improve the safety and provide one universal method of installing the child seats. On November 19, 1998, the Administration announced a Blue Ribbon Passenger Safety Panel that will recommend strategies to increase the use of booster seats for children 4 to 8 years and the use of seat belts for children 8 to 16 years. This group of children typically is currently not covered by state child seat use laws.

Child Restraint Q&As

2/24/99

Q: What did the President announce today?

A: The President announced a final rule to require a new universal way for installing child safety seats in cars and light trucks. Currently, parents use the vehicle seat belts to install child seats. There are a variety of models of child seats and they require different methods for installation. Parents have found attaching child safety seats using the vehicle's seat belts often is cumbersome and difficult. In the future, each new child seat will have three attachments (one top tether and two at its base). New cars and light trucks will be equipped with standard anchors in the back seat designed specifically to link to the child seat attachments. Each system will consist of a ready-to-use, visible and accessible upper anchorage to which the child seat tether hardware will attach. The vehicle seat will have two one-inch long bars spaced a foot apart and positioned where the vehicle seat cushion and seat back meet to which the child seat lower hardware will attach.

Q: How many lives will this rule save? How many injuries will this rule prevent?

A: Annually, motor vehicle crashes result in 800 child fatalities and 250,000 injuries for children less than seven years old. Even though child safety seats are very effective in reducing death and injury, their effectiveness is substantially reduced due to incorrect use and occasional incompatibility with the vehicle seat and belt systems. This rule is expected to prevent as many as 50 child deaths and 18,000 injuries each year.

Q: When will this rule take effect for cars and light trucks? For child seats?

A: For vehicles, eighty percent of new cars will be equipped with the top tether attachment points starting September 1, 1999. All new vehicles (cars and light trucks) will be equipped with the top tether attachment points by September 1, 2000. The lower anchorages are phased in over 3 years, covering 20% of vehicles by September 1, 2000, 50% of vehicles by September 1, 2001, and all vehicles after September 1, 2002.

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Q: How much will child seats increase in price as a result of this rule? How much will vehicle prices increase?

A: The additional cost that consumers will have to spend on a new child seat will be as low as \$15. (Typically, child safety seats range in price from \$50 to \$100. The vehicle additional cost is between \$3 and \$7.

Q: What previous efforts has the Administration taken to address this problem?

A: On October 13, 1993, the Federal vehicle occupant protection standard was amended to require, effective September 1, 1995, that vehicle seat belts on new passenger vehicles be lockable to tightly secure child seats.

In February 1995, the Department of Transportation set up a Blue Ribbon Panel of experts to recommend ways to install and use child safety seats. In May 1995, the Panel recommended the evaluation and development of a universal system to attach child safety seats.

In February 1997, the President announced the proposed rule regarding child safety seats in his weekly radio address. Today's announcement reflects comments the Department of Transportation received in order to improve the safety and provide one universal method of installing the child seats.

Q: How does this differ from what the Administration proposed earlier?

A: The Notice of Proposed Rulemaking (NPRM), announced by the President on February 15, 1997, proposed that every vehicle and child safety seat be equipped with either dedicated "mini-seat belts" solely for installing child safety seats, or two fixed rigid one-inch bars in the vehicle's back seat to which a child seat would attach with a variety of types of connectors. The final rule requires solely the latter approach. Commentators on the NPRM overwhelmingly favored having the government deciding on one attachment system. The final rule and NPRM are similar as to the requirements for vehicle to accommodate an upper tether attachment for the child seat.



U.S. Department of
Transportation

Office of the Secretary
of Transportation

400 Seventh St., S.W.
Washington, D.C. 20590

*Child
Safety Seat*

FAX TRANSMISSION COVER SHEET

DATE: 1/13/99

TO: Mary Smith

FAX NO: 456-7431

FROM: **Carrie Hyun**
Deputy Chief of Staff
Office: (202) 366-6800
Fax: (202) 366-3956

Number of pages transmitted, including cover sheet: 5

Message:

Here's what we have to date.

JAN. 13. 1999 4:02 PM DOT ST NO. 607 P. 2/3

Child Passenger Safety Week **February 14-20, 1999**

What is it?

National Child Passenger Safety Week, February 14-20, is a dedicated week that brings public attention to the problems of safe transportation for young children. Motor vehicle crashes continue to be the leading cause of death for children of every age from 6 to 14. The week provides an opportunity for states, communities, national organizations and advocates to conduct activities designed to promote seat belt, child safety seat, and bicycle helmet use and good safety habits for young pedestrians. Begun in 1983, and historically focused on child safety seats, this year the program has been expanded to include other issues related to the safe transportation of children.

Who are our partners?

American Academy of Pediatrics
Air Bag and Seat Belt Safety Campaign
Emergency Nurses Association
National Safe Kids Campaign
Healthy Mothers Healthy Babies
Association of Women Health, Obstetric, and Neonatal Nurses
Department of Health and Human Services/Maternal and Child Health

Doctors associated with the effort

Dr. Marilyn Bull
Riley Hospital for Children
Indianapolis, IN.

Dr. Flaura Koplin Winston
Children's Hospital of Philadelphia
Philadelphia, PA.

Dr. Murray Katcher
Chair, Committee on Injury and Poison Prevention (AAP)
Madison, WI.

Dr. Scott Berns
Rhode Island Hospital
Providence, Rhode Island

Dr. Barbara Barlowe
Harlem Children's Hospital
New York, N.Y.

Dr. Phyllis Agran
University of California - Irvine
Anaheim, CA.

Overview of Activities

Satellite Media Tour: Dr. Martinez will participate in a satellite media tour in 6-10 markets during CPS week.

Capital Kids: During this week kids will take the message about the importance of primary seat belt laws and strong enforcement of those laws to state capitals across the country. Sponsored by the Air Bag and Seat Belt Safety Campaign, the national press event will be in Washington D.C. and will kick off the week. Local media events are planned in targeted states.

Presidential Radio Address and Proclamation (requested): NHTSA is requesting that President Clinton dedicate his weekly radio address to child passenger safety and announce the progress made on increasing national seat belt use and reducing child fatalities.

Author: Carrie Hyun at OSTEXEC
Date: 1/11/99 11:42 AM
Priority: Normal
TO: Harold Gist at OSTCENTRAL
Subject: Congressional involvement in UCRA

Here's the latest from NHTSA, I already sent a heads up to Frazier,

Forward Header

Subject: Congressional involvement in UCRA
Author: Charlotte Hrnair<NHTSA> at CCHUB
Date: 1/11/99 10:10 AM

Suggestions for inclusion in roll-out.

Rep. Sheila Jackson Lee - co-chair of Children's caucus. (was going to come to blue ribbon panel announcement on Forgotten Children)

Rep. Ileana Ros-Lehtinen - co-chair of Children's Caucus

Rep. Steny Hoyer - staff has called and expressed interest in participating - has worked with us on child safety seat issues.

Rep. Frank Pallone - Member of House Commerce (oversight of motor vehicles) recently contacted us regarding a child safety seat issue involving his child.

Rep. Frank Wolf - Very active in the promotion of the NHTSA video on the safe transportation of newborns from the hospital.

Sen. Abraham - sponsor of the Child Passenger Protection Education Grants in T EA-21

Rep. Morella - minority staff mentioned her interest in the issue.

Sen. Dodd - Co-chair of Senate Children's Caucus

Sen. Specter - Co-Chair of Senate Children's Caucus

Chairman and Ranking of Oversight Committees

Rep. Wolf

Rep. Sabo

Rep. Shuster

Rep. Oberstar

Sen. Shelby

Sen. Lautenberg

Sen. Chafee

Sen. Baucus.

Will send you information on advocacy groups and others later today.

JAN.13.1999 4:22 PM DOT 31 NO.001 1.575

Author: Nancy DiModica at ostnovp

Date: 1/12/99 3:33 PM

Priority: Normal

Receipt Requested

TO: Carrie Hyun at OSTEXEC

Subject: Universal attachment for child safety seats

Mary (!)

- C

Mr. Conti forwarded your e-mail to me in Policy's Office of Policy Development, Safety Team regarding a possible WH domestic policy event during Child safety week. You asked for ideas for attendees. Since the Department emphasizes the work it does for its customers, i believe we should invite a few mothers with their children from the general public who will be using these seats.

Nancy DiModica, P-140 Policy Safety Team

Ch. 1d
Safety Seal

FINAL RULE

STANDARDIZED CHILD RESTRAINT SYSTEM

- Vehicle specifications for upper and lower anchorages dedicated to attach child restraint systems -- New **FMVSS 225**
- Child restraint specifications for attachments to vehicle tether and lower anchorages and improved child safety protection requirements -- **FMVSS 213**

FMVSS 225, TETHER ANCHORAGES AND CHILD RESTRAINT ANCHORAGE SYSTEMS

- **Applies to passenger cars, trucks and MPVs with GVWR $\leq$ 8,500 lb, except walk-in van-type and Postal Service vehicles; and to buses (including School) with GVWR $\leq$ 10,000 lb.**
- **Two rigid anchorages for each designated seating position:**
 - **Straight bars 6 mm (1/4") diameter and 25 mm (1") minimum length and spaced 280 mm (11") apart.**
 - **Positioned for consumer's ease of access and not to be injurious to the adult occupant.**
- **One consumer-ready-to-use, visible and accessible upper anchorage to which child restraint tether hardware attaches.**

REQUIRED NUMBER ANCHORAGES

- **For vehicles with 3 or more rear designated seating positions:**
 - **Two systems in rear positions Plus 1 tether anchorage at a third rear position.**
- **Vehicles with 1 or 2 rear designated seating positions:**
 - **Each position equipped.**

REQUIRED NUMBER ANCHORAGES (Continued)

- **Vehicles with no rear designated seating positions:**
 - **tethers in the front.**
 - **And if there is a cutoff switch, then a a complete system in front plus 1 tether.**
- **If vehicle has a small rear seat and a cutoff, 1 position in front and 1 in rear.**

FMVSS 213, CHILD RESTRAINT SYSTEMS

- **Tether hook hardware specified.**
- **On each side or bottom of CRS, two hardware components permanently attached to the CRS to link to specified vehicle lower anchorages:**
 - **Manufacturer selected hardware**
 - **Each belt strap to be adjustable for snug fit and disconnect**
- **Added safety performance requirements:**
 - **Head excursion 28 inches instead of current 32 inches.**
 - **Dual certification as currently with belt system.**

INTERNATIONAL HARMONIZATION

- **Harmonized with Canada and Australia:**
 - October 1, 1998, Canada's announcement of regulation to require consumer-ready anchorages and applicability to light trucks and MPVs.
- **Harmonized with anticipated European and Canadian regulations on lower anchorages:**
 - On May 23, 1998, Meeting of Experts (GRSP) of UN-ECE WP29 accepted lower rigid anchorages system for possible incorporation in ECE regulation.
 - In December 1998, GRSP will discuss proposal on top tether anchorages.

LEAD TIME OF VEHICLE ANCHORAGES

Upper Tether Anchorage

– Period of Manufacture	% of Vehicle Fleet
• 9/1/1999 to 8/31/2000	90
• On or after 9/1/2000	100

Lower Anchorages

– Period of Manufacture	% of Vehicle Fleet
• 9/1/2000 to 8/31/2001	20
• 9/1/2001 to 8/31/2002	50
• On or after 9/1/2002	100

LEAD TIME OF CHILD RESTRAINTS

Upper Tether Anchorage Attachment

– Period of Manufacture	% of Child Restraint
• September 1, 1999	100

Lower Anchorage Attachments

– Period of Manufacture	% of Child Restraint
• September 1, 2002	100

CRS Manufacturers disagreed with phase-in; having no control over what retailers buy/sell (will not order more expensive seats).

CONSUMER COST OF VARIOUS TYPES OF SYSTEMS (\$1996)

Restraint Type	Per Child Restraint	Per Vehicle*	Total Annual Cost ^u
CRS Rigid	\$33.87 - \$43.87	\$2.82 to \$6.62	\$217 - \$256 Million
CRS Nonrigid	\$9.62 - \$21.09	\$2.82 to \$6.62	\$123 - \$167 Million

* The range represents vehicles with no rear seat (meaning anchorage required for one front seat) to vehicles with two or three rear seating positions (meaning two seating positions with lower anchorages and tether plus one seating position with just a tether).

Ch. 1d
Safety Seal

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LEAD TIME OF CHILD RESTRAINTS

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Child Restraint Q&As
12/07/98

Q: What did the President announce today?

A: The President announced a major new step to protect our traveling children - a new universal way for installing child safety seats in cars and light trucks. Currently, parents use the vehicle seat belts to install child seats. Attaching child safety seats using the vehicle's seat belts often is cumbersome and difficult, as seat belt designs have been optimized in recent years for adult protection not child seat installation. In the future, each new child seat would have three attachments (one top tether and two at its base). New cars and light trucks will be equipped with standard anchors in the back seat designed specifically to link to the child seat attachments. Typically, vehicles will be required to install 2 systems in the rear seat so that two child seats can be anchored. Each system will consist of a ready-to-use, visible and accessible upper anchorage to which the child seat tether hardware will attach. The vehicle seat will have two one-inch long bars spaced a foot apart and positioned where the vehicle seat cushion and seat back meet to which the child seat lower hardware will attach.

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Q: How many lives will this rule save? How many injuries will this rule prevent?

A: Annually, motor vehicle crashes result in 800 child fatalities and 250,000 injuries for children less than seven years old. Even though child safety seats are very effective in reducing death and injury, their effectiveness is substantially reduced due to incorrect use and occasional incompatibility with the vehicle seat and belt systems. This rule is expected to prevent as many as 50 child deaths and 18,000 injuries each year.

Q: What other benefits does this rule have?

A: Parents are generally dissatisfied with the current vehicle belt system for attaching child seats because of the complexity and difficulty to tighten the child seat. Lap/shoulder belts often require use of a locking clip (which is typically misused) to remove slack from the seat belt, and the belt anchorages often are too far forward, resulting in child seats not being tightly installed. The rule will eliminate these problems and make child seat

installation much more convenient to parents.

Q: When will this rule take effect for cars and light trucks? For child seats?

A: For vehicles, eighty percent of new cars will be equipped with the top tether attachment points starting September 1, 1999. All new vehicles (cars and light trucks) will be equipped with the top tether attachment points by September 1, 2000. The lower anchorages are phased in over 3 years, covering 20% of vehicles by September 1, 2000, 50% of vehicles by September 1, 2001, and all vehicles after September 1, 2002.

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Q: Does this rule support international harmonization?

A: The upper tether anchorage requirement is harmonized with Canada and Australia, who have a long history of using upper tethers on child safety seats. The lower anchorages are harmonized with anticipated European and Canadian regulations.

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A: Essentially all vehicle manufacturers strongly support the use of a rigid fixed 1-inch bar system. Essentially all child seat manufacturers now prefer the one-inch bar system of the final rule.

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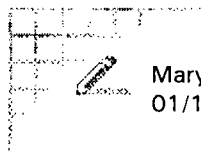
In February 1995, the Department of Transportation set up a Blue Ribbon Panel of experts to recommend ways to install and use child safety seats. In May 1995, the Panel recommended the evaluation and development of a universal system to attach child safety seats.

Q: What other recent efforts has the Clinton Administration taken with respect to child safety?

A: Most recently, on November 19, 1998, the Administration announced a Blue Ribbon Passenger Safety Panel called *Protecting the Forgotten Children* that by mid-1999 will recommend strategies to increase the use of booster seats for children 4 to 8 years and the use of seat belts for children 8 to 16 years. This group of children typically is currently not covered by state child seat use laws. Children of this age group have low restraint use rates with the result that motor vehicle crashes are the leading cause of death for this age group.



012815CL.TXT



Mary L. Smith
01/19/99 12:02:37 PM

Record Type: Record

To: Thomas L. Freedman/OPD/EOP

cc:

Subject: Draft Child Safety Seat Issue Talking Points

This is what is on OMB's website

DOT-NHTSA RIN: 2127-AG50
Federal Motor Vehicle Safety Standards: Child Restraint
Anchorage Systems, Child Restraint Systems
RECEIVED: 12/14/1998 STAGE: Final Rule
** COMPLETED: 01/13/1999 Consistent with change

----- Forwarded by Mary L. Smith/OPD/EOP on 01/19/99 12:03 PM -----



Carrie.Hyun @ ost.dot.gov
01/19/99 11:46:00 AM

Record Type: Record

To: Mary L. Smith

cc:

Subject: Draft Child Safety Seat Issue Talking Points

FYI, ALSO NHTSA INFORMED ME THIS MORNING THAT OMB POSTED THE FINAL RULE ON ITS WEBSITE -- WE HAVE NOT CONFIRMED THIS -- IF SO, WE NEED TO MOVE ON AN ANNOUNCEMENT AS REPORTERS WILL BEGIN CALLING. DR. MARTINEZ TOLD ME THIS MORNING THAT DATELINE WANTS TO DO A TAPED SEGMENT TO AIR THE NIGHT OF THE ANNOUNCEMENT. I ASKED HIM TO HOLD UNTIL WE HAD A CHANCE TO DISCUSS. PLEASE CALL WHEN YOU HAVE A CHANCE AFTER TO VISIT WITH YOUR FOLKS. THANKS, CARRIE

Forward Header

Subject: Draft Child Safety Seat Issue Talking Points
Author: Victor Weissberg <NHTSA> at CCHUB
Date: 1/15/99 7:20 PM

-- see attachments --



011911DH.WPD 011911DI.TXT

death.

Abuckele 1/8/99
Smith
Child Seats 1 omb, DOT (carried ATISAR Phil Reel
High → Also umbrellas ✓

When - mid Jan.

→ Consensus

Where - look as event

→ GM - OK.

- paper

Who else should be here?

Also new factories

Advocates

Event

Abuckele
1115 - right

Outreach
→

big car gun machine

Arnold Mann

Noon -

FAX

- should be available

Advocates & May 1999

Consumer Union

Consumer Federal

Center Inst.

Insurance Inst.

Consumer Union

Bob Shelton

Ch. sent materials

Leg. Affairs
Lambert's

TO: Phil Recht
Bill Schulz

FROM: Mike Russell
Rae Tyson

DATE: December 2, 1998

RE: Possible White House event to announce the new child seat anchor rule

*Mary:
This was the
earlier memo
Rae*

The event:

- Secretary Slater: Opening remarks
- Safety advocate: Joseph Callala of the Dana Foundation
- President Clinton: Announces the rule
- Secretary Slater demonstrates the anchor on a bench seat, closes the press conference

Cars equipped with anchors, car seats will be on display; children ages 3-4 and their parents will be in attendance under all possible event scenarios.

Possible locations

- White House, South lawn (weather permitting) Advantages: Good visuals; easy access for POTUS, S1 and press. Alternate foul weather location: White House, room 450.
- Smithsonian Museum of American History. There is a day care center at the Smithsonian for children ages 3-4. There is a patio suitable for a press conference, weather permitting. The display vehicles will fit on the patio. Advantages: Good visuals (Washington Monument in the background), easy to secure, kids are nearby. Disadvantages: Given the short period of time, logistics will be difficult. Alternate foul weather location: Automotive section of the museum or an auditorium.
- Department of Transportation, L'Enfant Plaza. The event would be staged in the courtyard. Children would be transported from nearby day care centers. Advantages: Good visuals, easier to arrange on short notice. There also is ample space for display vehicles.
Alternative foul weather site: Room 450, White House.

the Dana Foundation

Joe's niece Dana was killed in a crash in 1995. Findings from the crash indicated that there was a compatibility problem between the vehicle belt system and the child safety seat.

As a result of their tragic loss, Joe and his father, an emergency physician, formed the Dana Foundation, named after Dana. The Foundation continues to educate the public on the problems of misuse of child safety seats. The compatibility issue that will be solved by the new child seat anchor rule has been a goal of the Foundation.

Draft 12-03-98 2:00pm

**PRESIDENT CLINTON ANNOUNCES NEW RULE WHICH WILL
PROTECT THIS NATION'S CHILDREN BY IMPROVING
THE INSTALLATION OF CHILD SAFETY SEATS IN VEHICLES**

December 7, 1998

✓ Today President Clinton will announce a major new step to protect our traveling children -- a new universal way for installing child safety seats in cars and light trucks. This rule will each new child seat to have three attachments -- one on top and two at the base -- by September 1, 2002. By 2002, all new cars and light trucks will be equipped with standard anchors in the back seat designed specifically to link to the child seat attachments. This rule is expected to prevent as many as fifty child deaths and 18,000 injuries each year.

Improved Method of Installation Will Save Lives

This rule requires new features on both vehicles and child safety seats. For the child safety seats, there will be three attachments, a tether on top and two at the base. For vehicles, new standard anchors will be installed in the back seat which are designed to link to the new child seat attachments. Typically, vehicles will be required to install 2 systems in the rear seat so that two child seats can be anchored. Each system will consist of a ready-to-use, visible and accessible upper anchorage to which the child seat tether hardware will attach. The vehicle seat will have two one-inch long bars spaced a foot apart and positioned where the vehicle seat cushion and seat back meet to which the child seat lower hardware will attach.

Currently, parents use the vehicle seat belts to install child seats which often is cumbersome and difficult because seat belt designs have been optimized in recent years for adult protection not child seat installation.

Effective Date of Rule for Both Vehicles and Child Seats

For vehicles, eighty percent of new cars will be equipped with the top tether attachment points starting September 1, 1999. All new vehicles (cars and light trucks) will be equipped with the top tether attachment points by September 1, 2000. The lower anchorages are phased in over 3 years, covering 20% of vehicles by September 1, 2000, 50% of vehicles by September 1, 2001, and all vehicles after September 1, 2002.

For the child seats, starting September 1, 1999, all new child seats will be equipped with an upper tether. All new child seats will be equipped with the two lower attachments by September 1, 2002. New child seats will also remain installable with regular vehicle seat belts to assure compatibility with older vehicles and aircraft.

Builds on the President's Efforts to Protect Children in Vehicles

These steps are just a few of President Clinton's efforts to promote safety for children on the road. Most recently, on November 19, 1998, the Administration announced a Blue Ribbon Passenger Safety Panel that will recommend strategies to increase the use of booster seats for children 4 to 8 years and the use of seat belts for children 8 to 16 years. This group of children typically is currently not covered by state child seat use laws. Children of this age group have low restraint use rates with the result that motor vehicle crashes are the leading cause of

death.

*Child Safety
Seats*

FINAL RULE

Standardized Child Restraint System

**National Highway Traffic Safety Administration
October 8, 1998**

FOR OFFICIAL USE ONLY

SAFETY PROBLEM

- **Effectiveness of child restraint systems (CRS) in reducing fatalities in motor vehicles: 71%.**
- **In actual use, effectiveness reduced to 59% due to incorrect use and incompatibility between vehicle seat/belt systems and CRS:**
 - **Lap/shoulder not lap belts require use of a Clip (Misused/not used 72%).**
 - **Forward belt anchorages.**

PREVIOUS SOLUTIONS

- **SAE J1819 Recommended Practice specified guidelines:**
 - **Design-restrictive compliance, resulting in more design difficulties.**
 - **Not sufficient to solve incompatibility.**
- **Lockability requirement (FMVSS 208):**
 - **Limited to requiring lap belt to be lockable for tight securement of CRS.**
 - **CRS still have excessive forward movement due to forward-mounted anchorages.**

PROPOSED REQUIREMENTS

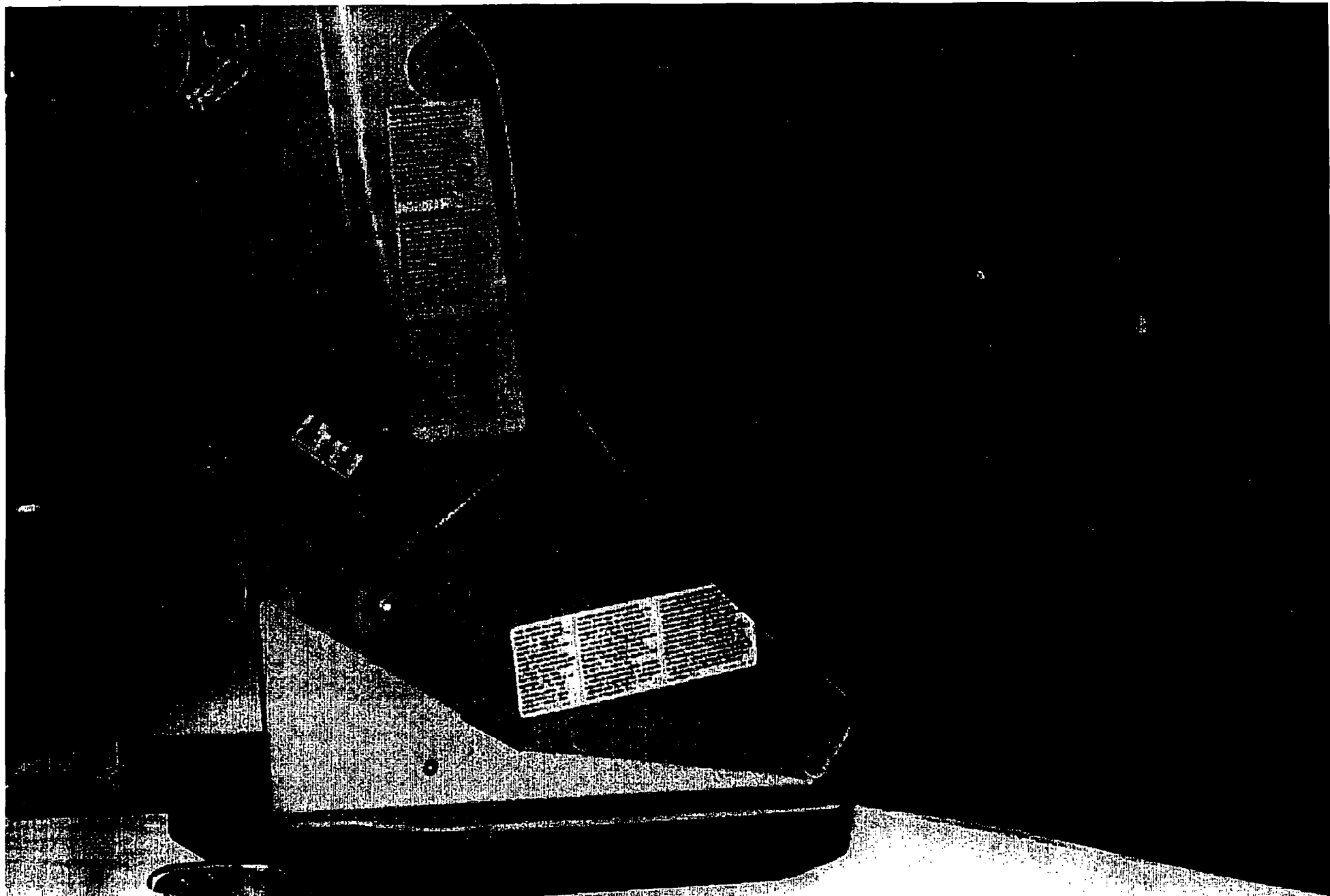
- **Vehicle equipped w/tether anchor and flat latchplates.**
 - 6 mm bar option but w/adapter.
 - Two rear vehicle seating positions.
 - One seating position required in front vehicle seat if air bag switch in vehicle.
 - Applicable to all passenger cars, light trucks and vans (under 10,000 lb GVWR).
- **Child restraint system.**
 - Equipped with webbing/buckle and allowing bracket-based CRS.
 - Reduced head excursion limits will indirectly require an upper tether.
 - Must also be usable in current fleet of vehicles, w/ vehicle seat belt.

DEMONSTRATION

FOR OFFICIAL USE ONLY



FOR OFFICIAL USE ONLY



FOR OFFICIAL USE ONLY

MAJOR COMMENTS TO NPRM

- **More than 60 comments received:**
 - **General support from manufacturers & safety advocates in US and abroad for Agency's efforts towards solving problem of incompatibility.**
- **No consensus on a single Standardized System hardware:**
 - **GM supports flat latchplate; other vehicle manufacturers and Canada support a 6 mm rigid bar.**
 - **CRS Manufacturers except Britax, Cosco and Fisher-Price support latchplate but not other hardware.**

CONSUMER CLINIC

- **AAMA, AIAM and manufacturers of child restraints planned a clinic in Novi, Michigan, April 15-20, 1998.**
- **To determine which of 7 CRS alternatives consumers find most acceptable.**
- **Total sample of 254.**
 - **Primary caregivers: 194.**
 - **Empty nesters/secondary caregivers: 60.**

PROPERTIES EVALUATED IN CLINIC

- **Baseline (K) - Current U.S. CRS, (vehicle belt system). Price: \$63.**
- **Top tether (N) - Current Canadian CRS, (vehicle belt system and a top tether). Price: \$68.**

STRAP-BASED CRS WITH BUCKLE CONNECTORS [UCRA] (M)

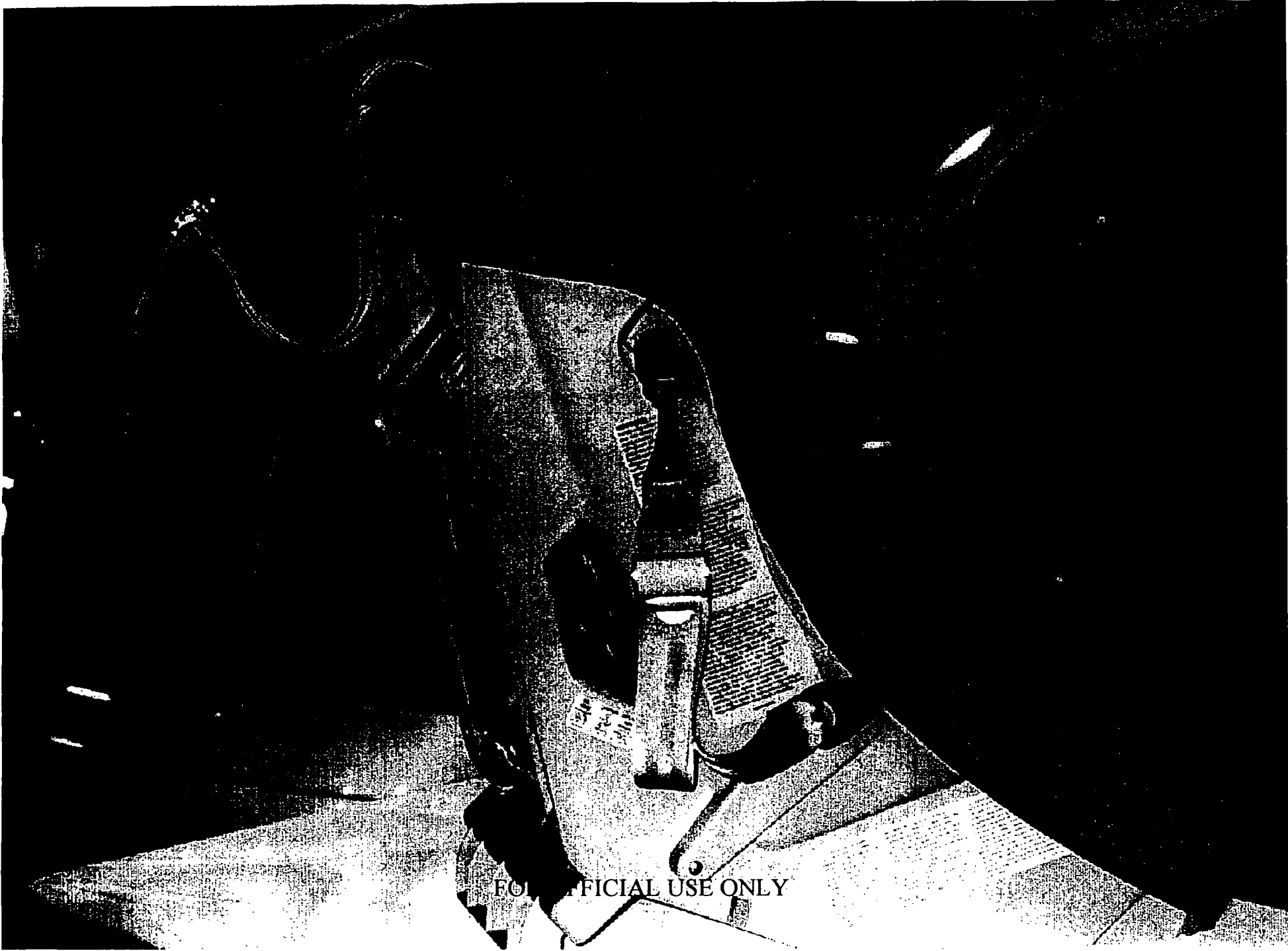
CRS with top tether and 2 manually adjusted side straps/buckles that connect to semi-flexible lower anchorage flat latchplates.

PRICE: \$78

FOR OFFICIAL USE ONLY

STRAP-BASED ISO CRS WITH SNAP HOOK CONNECTORS (R)
CRS with top tether and 2 manually adjusted side straps/snap hook that connect to rigid 6mm bar anchorages. (Access cups in vehicle not used).

PRICE: \$73

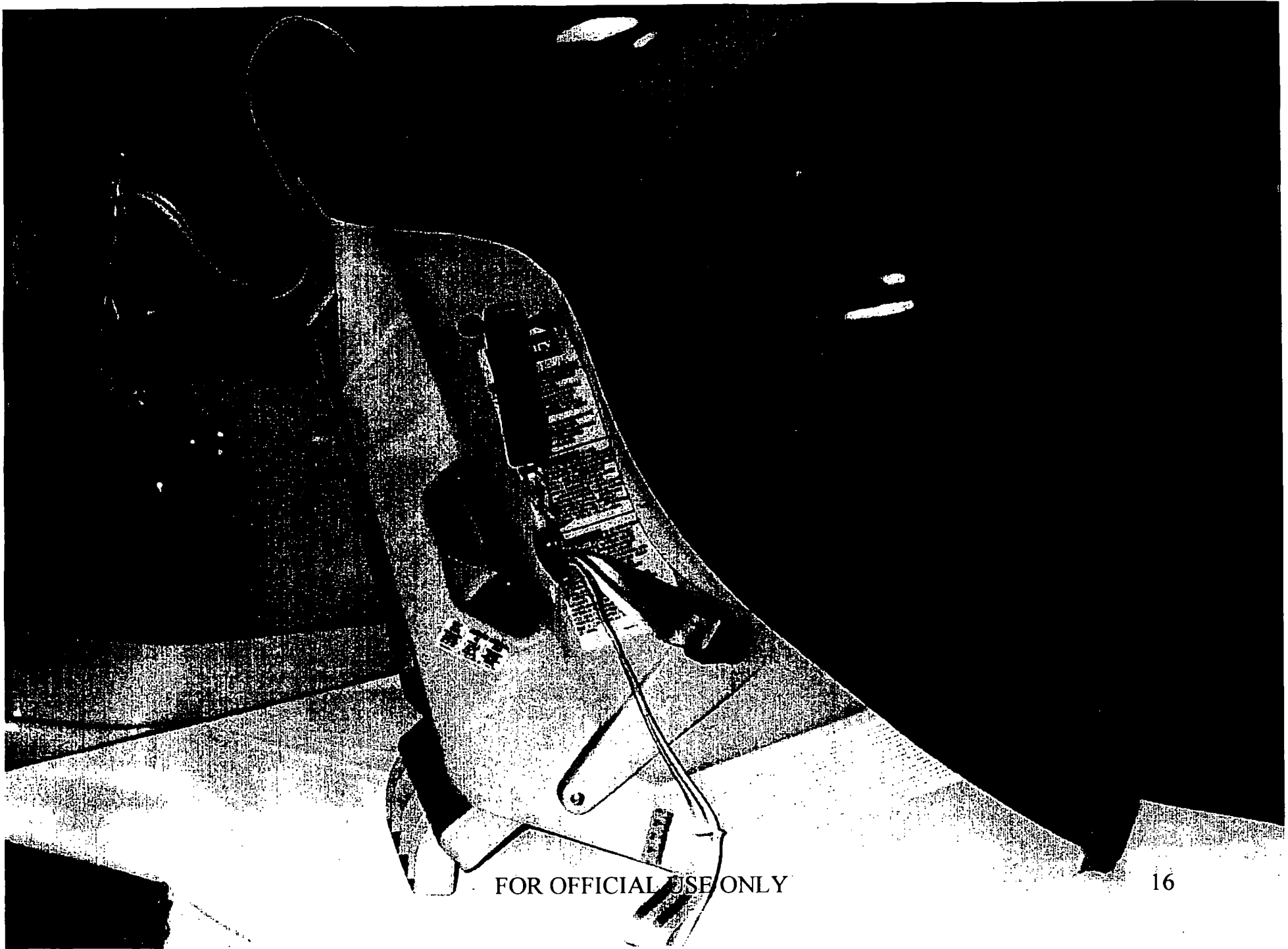


FOR OFFICIAL USE ONLY

STRAP-BASED CRS WITH ISO CONNECTORS (VON RIESEN)
TO 6mm BAR (S)

CRS with top tether and 2 manually adjusted side Straps/ISO connectors that connect to rigid 6mm bar lower anchorage. (Access cups in vehicle used).

PRICE: \$80

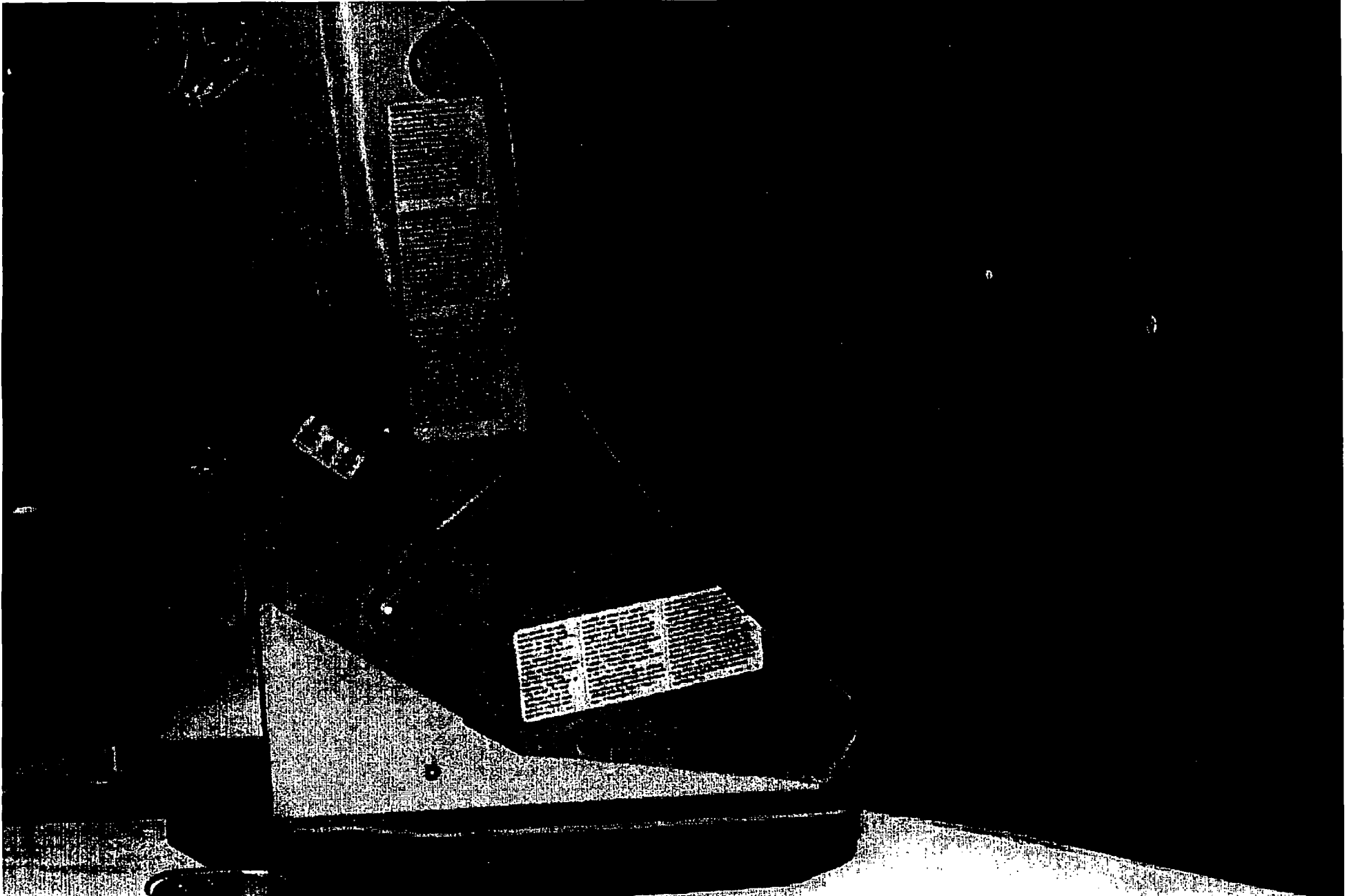


FOR OFFICIAL USE ONLY

**BRACKET-BASED CRS WITH ISOFIX CONNECTORS [2PT
ISOFIX] (L)**

**CRS with top tether and 2 ISOFIX brackets that connect to rigid 6mm bar lower anchorages.
(Access cups in vehicle used).**

PRICE: \$128



FOR OFFICIAL USE ONLY

REASONS FOR FIRST CHOICE PREFERENCE

(Total Sample By %)

	Baseline	Top Tether	Strap Buckle Connector	Strap ISO Snap Hook Connector	Bracket ISOFIX Connector	Bracket Latch Plate Buckle Connector	Strap ISO Connector 6mm Bar
Easy to Install/Easy to Use	67	56	76 /	32	76 /	50	63
Cost/Price	47 /	44 /	20	29	6	0	20
Easy to Remove	33 /	25	35 /	16	35 /	0	29
Mechanism/Latch Can Be Hidden	7	0	12	26	4	0	9
Seems Secure/Stable	7	38	63 /	63 /	65 /	0	60 /
Seems Safe	20	6	11	13	33 /	0	17
	K	N	M (UCRA)	R	L	P	S

FOR OFFICIAL USE ONLY

SUMMARY OF CLINIC FINDINGS

- **Consumers consider “most important” features of a CRS:**
 - **Three-point attachment system (Most secure).**
 - **Minimal operating steps and parts.**
 - **Simple to use seat.**
- **Features of strap-based restraint with buckle connectors were most preferred (familiarity) but concern over unintentional unlatching.**
- **Bracket-based CRS/ ISOFIX restraint was second most preferred choice, which was depressed by weight and price.**

POSITION OF VEHICLE MANUFACTURERS

- **Most vehicle manufacturers commented on clinic findings and expressed support and preference for the rigid 6mm bar hardware. GM supported the flat latchplate.**
- **No consensus on the interpretation of the survey data.**

POSITION OF CRS MANUFACTURERS

- **All CRS manufacturers except Evenflo commented on clinic findings and expressed support and preference for the rigid 6mm bar:**
 - Strong support to require soft webbing & tether on CRS.
 - Requested some changes to ISO bar locations specification to accommodate the space available for adjustability on all CRS types.
 - Requested a provision that the anchorage be accessible and visible.
- **Manufacturers objected to a final rule that:**
 - Requires a separate adapter or supplemental anchorage component to meet the location and/or accessibility requirements.
 - Prohibits a rigid bracket-based CRS which can attach to the 6 mm bars.

COSCO CAR SEAT ONLY (CSO)

- **Cosco rejected UCRA and rigid system because of increase in retail price of CRS (resulting in lower CRS use and higher child deaths and injuries).**
- **Cosco commented after the clinic that “the round bar attachment system rigidly but accessibly mounted is, in fact, better than the flat latch plate for a universal CRS.”**
- **To be noted: Essentially, CSO is same as current belt system as to proper belt routing and difficulty of attachment and tightening of CRS.**

NHTSA EVALUATION OF CLINIC FINDINGS

- Study is not definitively supportive of either strap-based buckle connector or ISO bar-based system.
- Highest scores for strap-based system (buckle/flat latchplate) reflecting familiarity with hardware and optimized features.
- Properties were at different stages of development ranging from fully developed flat latchplate buckle to conceptual prototype buckle to attach to 6 mm bars.

FINAL RULE

FOR OFFICIAL USE ONLY

STANDARDIZED CHILD RESTRAINT SYSTEM

- Vehicle specifications for upper and lower anchorages dedicated to attach child restraint systems -- New **FMVSS 225**
- Child restraint specifications for attachments to vehicle tether and lower anchorages and improved child safety protection requirements -- **FMVSS 213**

FMVSS 225, TETHER ANCHORAGES AND CHILD RESTRAINT ANCHORAGE SYSTEMS

- **Applies to passenger cars, trucks and MPVs with GVWR $\leq$ 8,500 lb, except walk-in van-type and Postal Service vehicles; and to buses (including School) with GVWR $\leq$ 10,000 lb.**
- **Two rigid anchorages for each designated seating position:**
 - **Straight bars 6 mm (1/4") diameter and 25 mm (1") minimum length and spaced 280 mm (11") apart.**
 - **Positioned for consumer's ease of access and not to be injurious to the adult occupant.**
- **One consumer-ready-to-use, visible and accessible upper anchorage to which child restraint tether hardware attaches.**

REQUIRED NUMBER ANCHORAGES

- **For vehicles with 3 or more rear designated seating positions:**
 - **Two systems in rear positions Plus 1 tether anchorage at a third rear position.**
- **Vehicles with 1 or 2 rear designated seating positions:**
 - **Each position equipped.**

REQUIRED NUMBER ANCHORAGES (Continued)

- **Vehicles with no rear designated seating positions:**
 - **tethers in the front.**
 - **And if there is a cutoff switch, then a a complete system in front plus 1 tether.**
- **If vehicle has a small rear seat and a cutoff, 1 position in front and 1 in rear.**

FMVSS 213, CHILD RESTRAINT SYSTEMS

- **Tether hook hardware specified.**
- **On each side or bottom of CRS, two hardware components permanently attached to the CRS to link to specified vehicle lower anchorages:**
 - **Manufacturer selected hardware**
 - **Each belt strap to be adjustable for snug fit and disconnect**
- **Added safety performance requirements:**
 - **Head excursion 28 inches instead of current 32 inches.**
 - **Dual certification as currently with belt system.**

INTERNATIONAL HARMONIZATION

- **Harmonized with Canada and Australia:**
 - October 1, 1998, Canada's announcement of regulation to require consumer-ready anchorages and applicability to light trucks and MPVs.
- **Harmonized with anticipated European and Canadian regulations on lower anchorages:**
 - On May 23, 1998, Meeting of Experts (GRSP) of UN-ECE WP29 accepted lower rigid anchorages system for possible incorporation in ECE regulation.
 - In December 1998, GRSP will discuss proposal on top tether anchorages.

LEAD TIME OF VEHICLE ANCHORAGES

Upper Tether Anchorage

– Period of Manufacture	% of Vehicle Fleet
• 9/1/1999 to 8/31/2000	90
• On or after 9/1/2000	100

Lower Anchorages

– Period of Manufacture	% of Vehicle Fleet
• 9/1/2000 to 8/31/2001	20
• 9/1/2001 to 8/31/2002	50
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LEAD TIME OF CHILD RESTRAINTS

Upper Tether Anchorage Attachment

– Period of Manufacture	% of Child Restraint
• September 1, 1999	100

Lower Anchorage Attachments

– Period of Manufacture	% of Child Restraint
• September 1, 2002	100

CRS Manufacturers disagreed with phase-in; having no control over what retailers buy/sell (will not order more expensive seats).

CONSUMER COST OF VARIOUS TYPES OF SYSTEMS (\$1996)

Restraint Type	Per Child Restraint	Per Vehicle*	Total Annual Cost
CRS Rigid	\$33.87 - \$43.87	\$2.82 to \$6.62	\$217 - \$256 Million
CRS Nonrigid	\$9.62 - \$21.09	\$2.82 to \$6.62	\$123 - \$167 Million

* The range represents vehicles with no rear seat (meaning anchorage required for one front seat) to vehicles with two or three rear seating positions (meaning two seating positions with lower anchorages and tether plus one seating position with just a tether).

BENEFIT-COSTS PER EQUIVALENT FATALITY

CRS	Fatality Benefits*	Injury Benefits	Cost per Equivalent Fatality (Millions)
Rigid	29 to 46	7,234 to 19,209	\$0.72 to \$1.26
Nonrigid	34 to 48	7,553 to 19,308	\$0.61 to \$1.04

- *1) Estimated lives lost by misuse is 68, of which 34 could be affected by this rule.
2) Most of the remaining 34 are from not properly securing child to child restraint.
3) 6 to 18 lives saved (Increased effectiveness of new system) + 23 to 28 lives saved rigid and 28 to 30 non-rigid (Elimination of misuse).

Child
Safety
Seat

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October 8, 1998**

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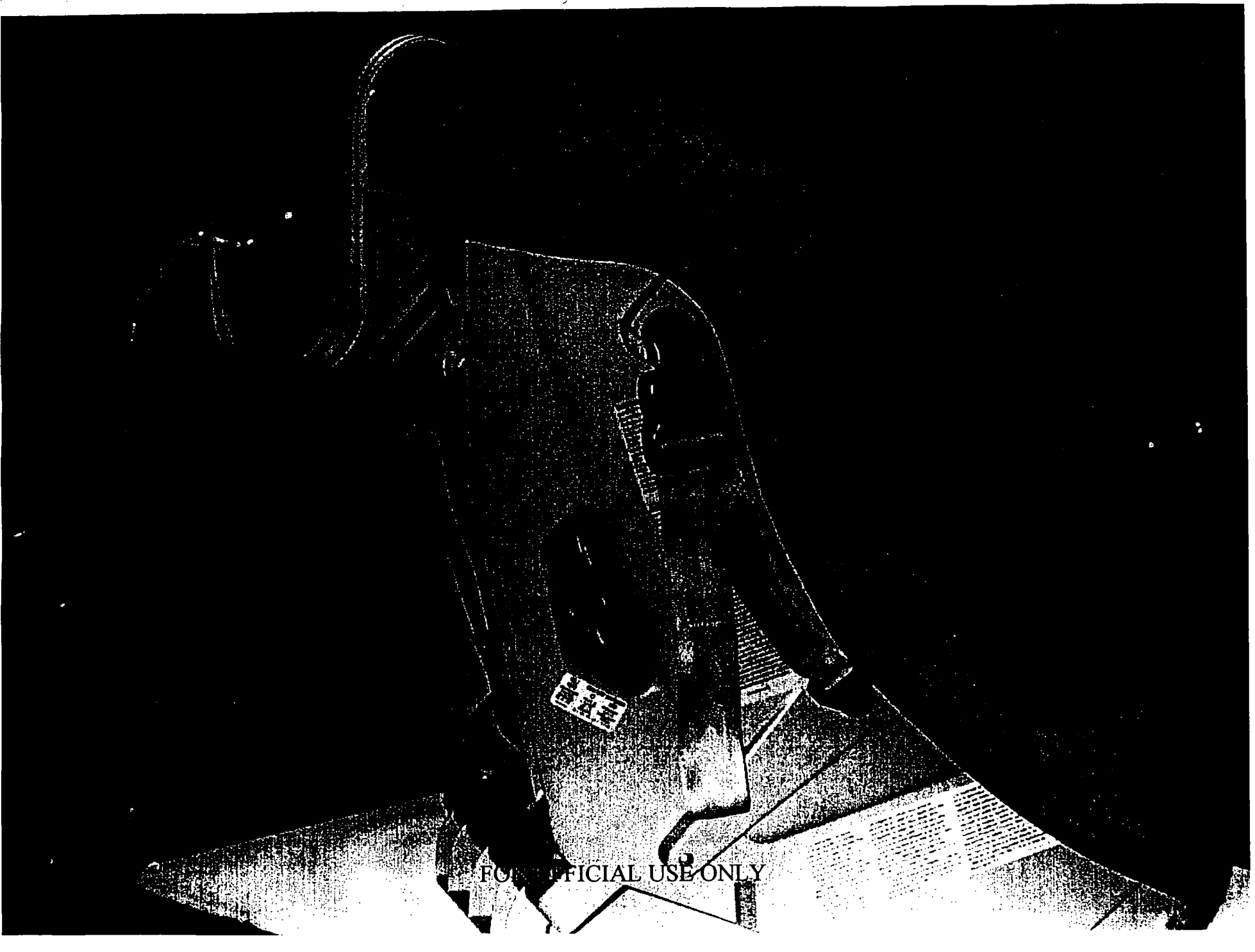
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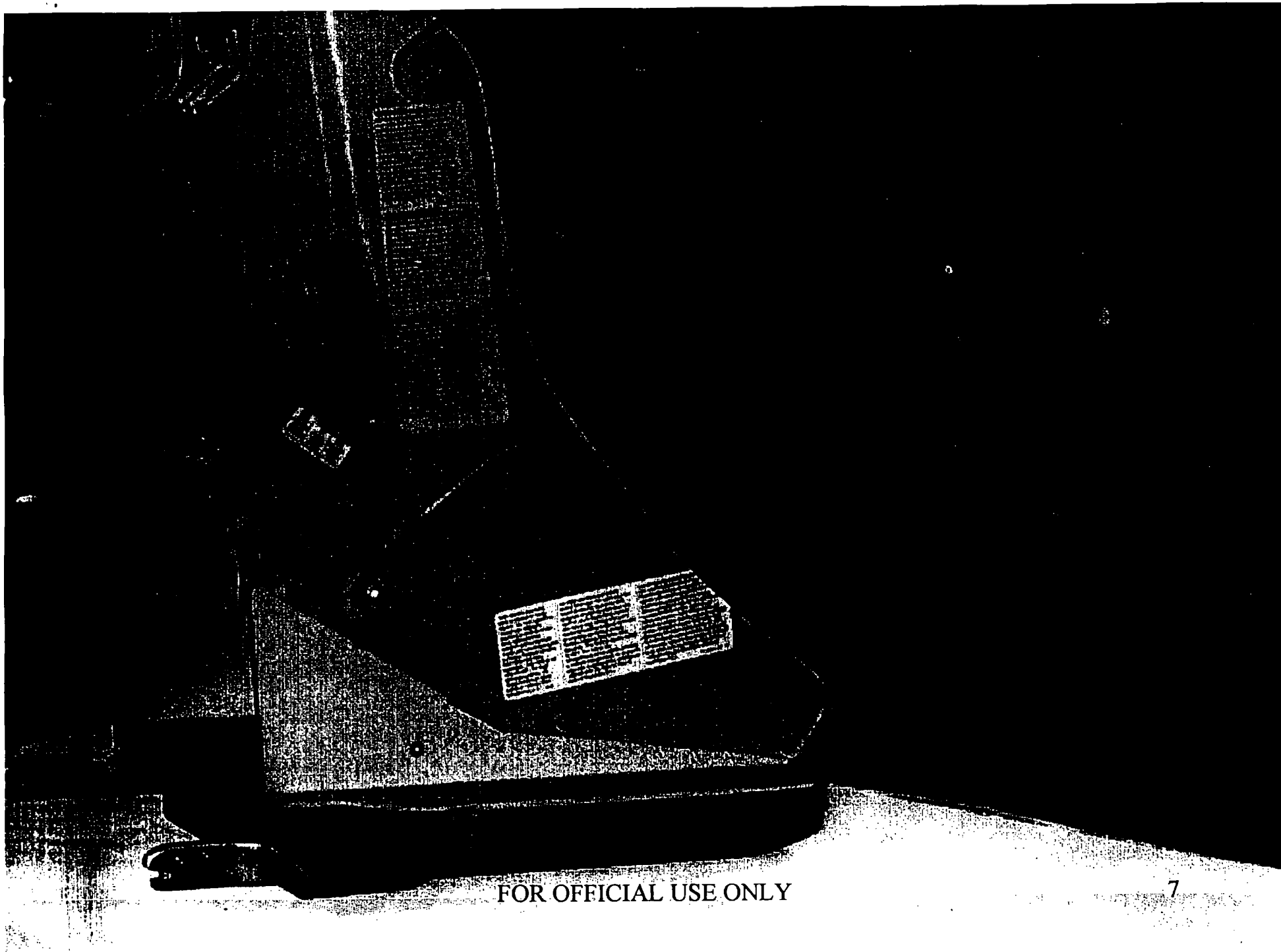
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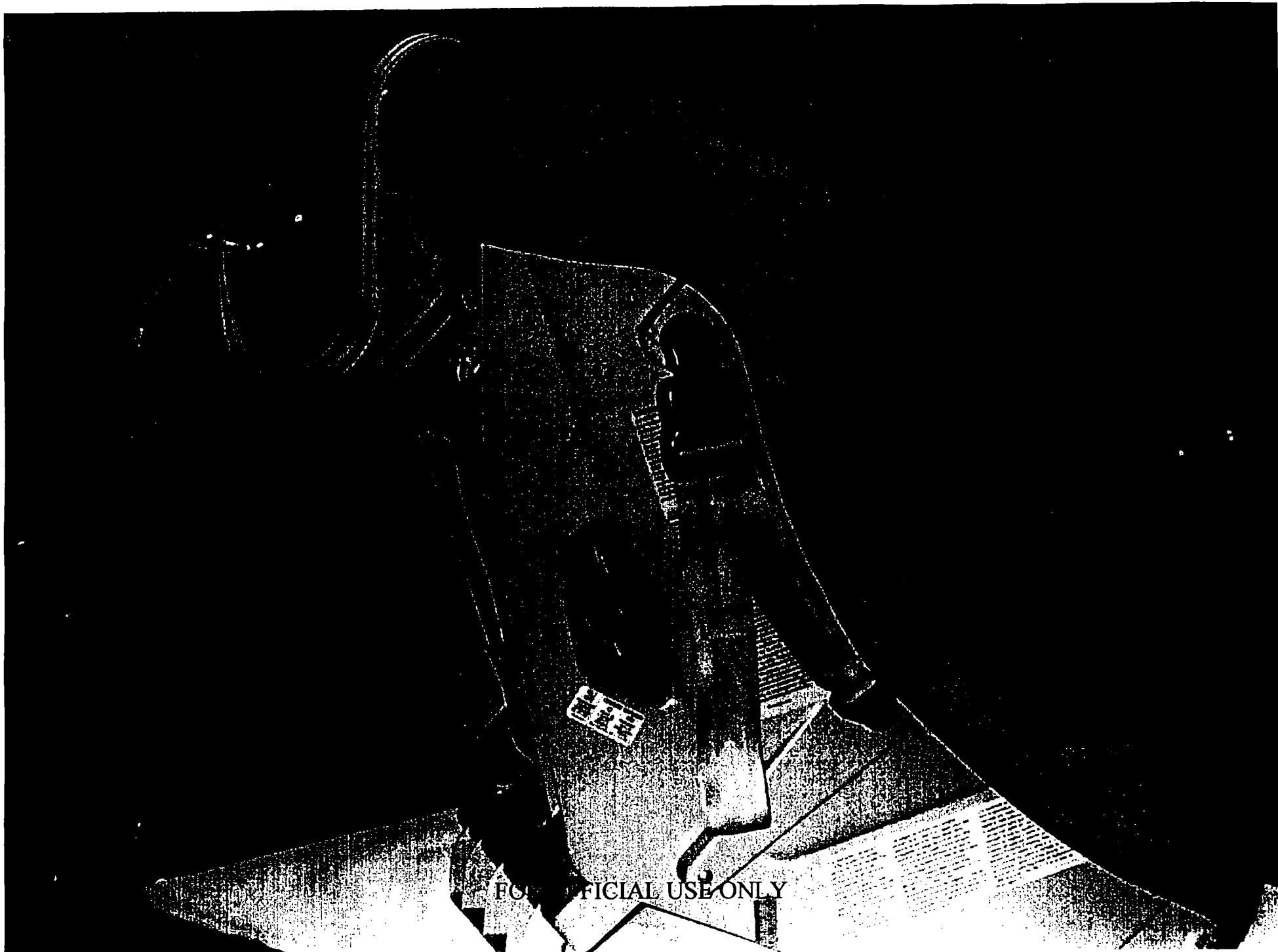
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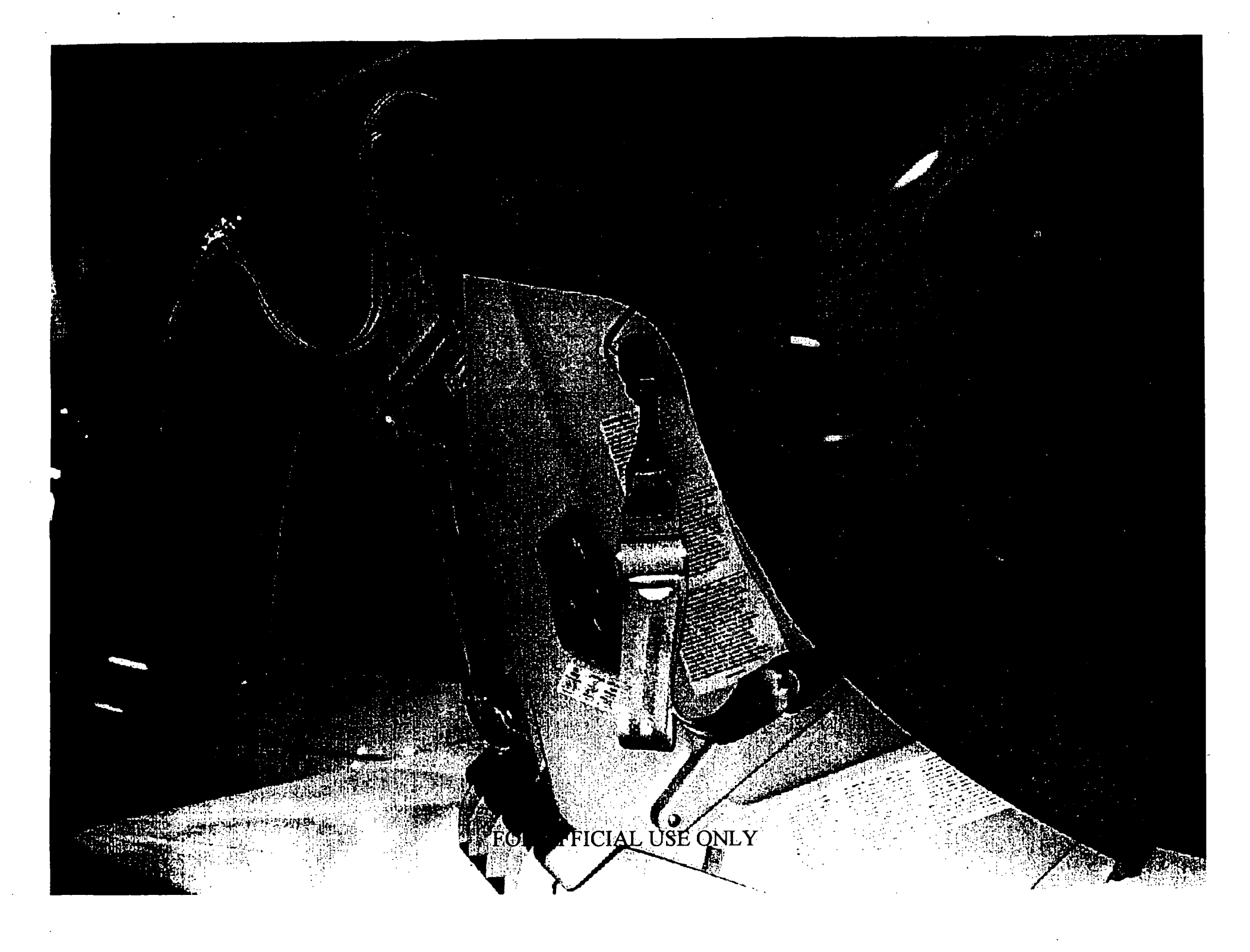
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FOR OFFICIAL USE ONLY

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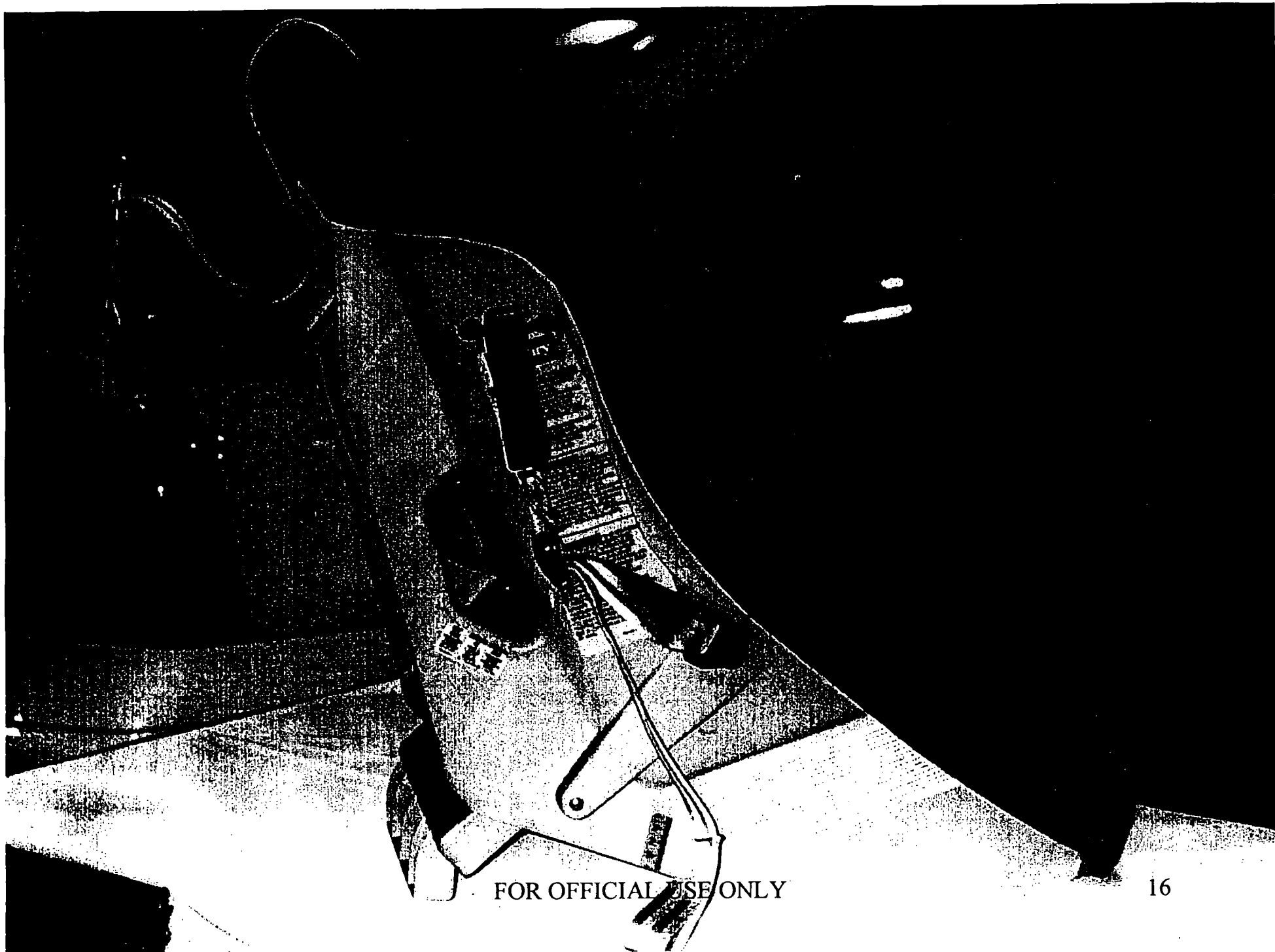


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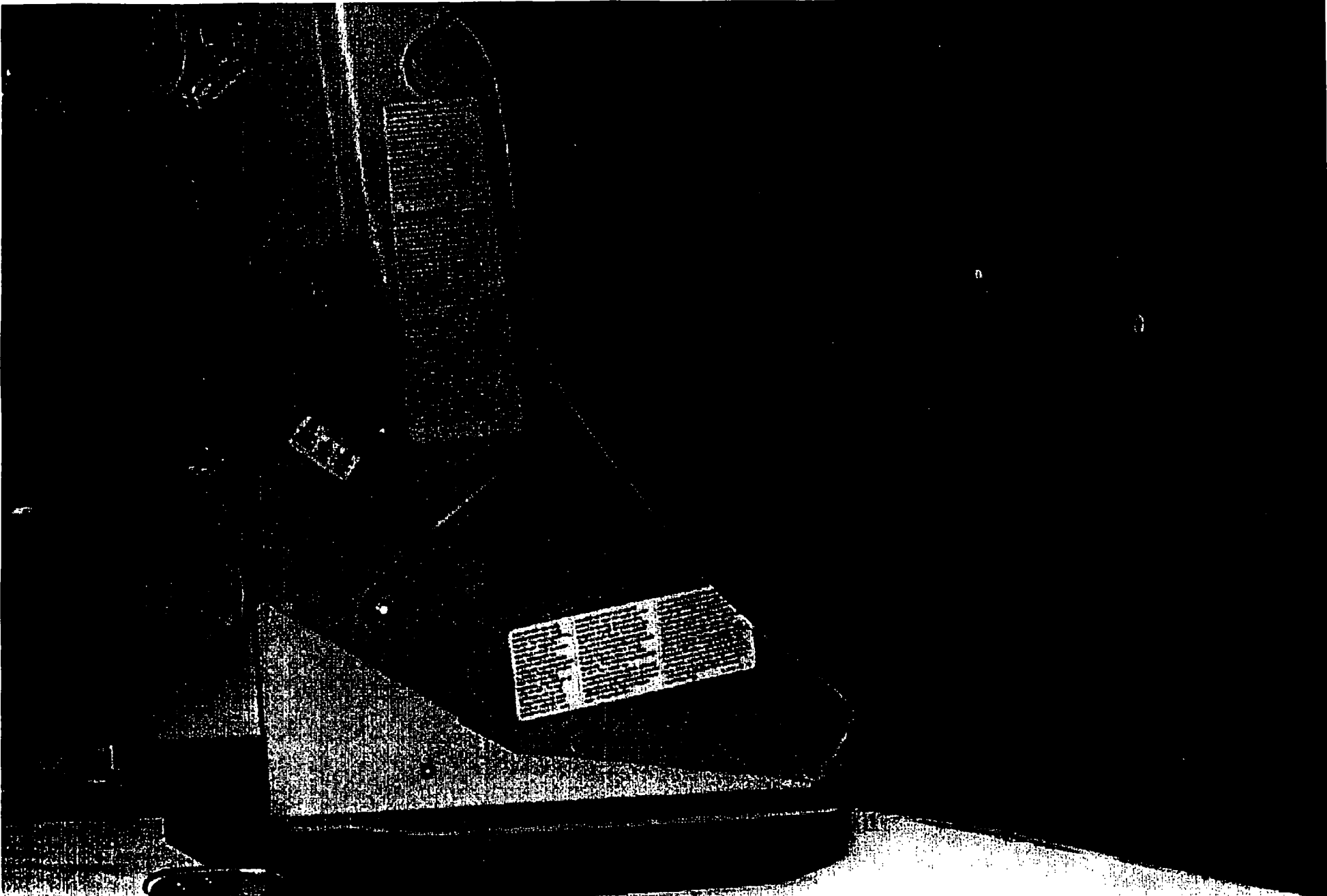


FOR OFFICIAL USE ONLY

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PRICE: \$128



FOR OFFICIAL USE ONLY

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LEAD TIME OF CHILD RESTRAINTS

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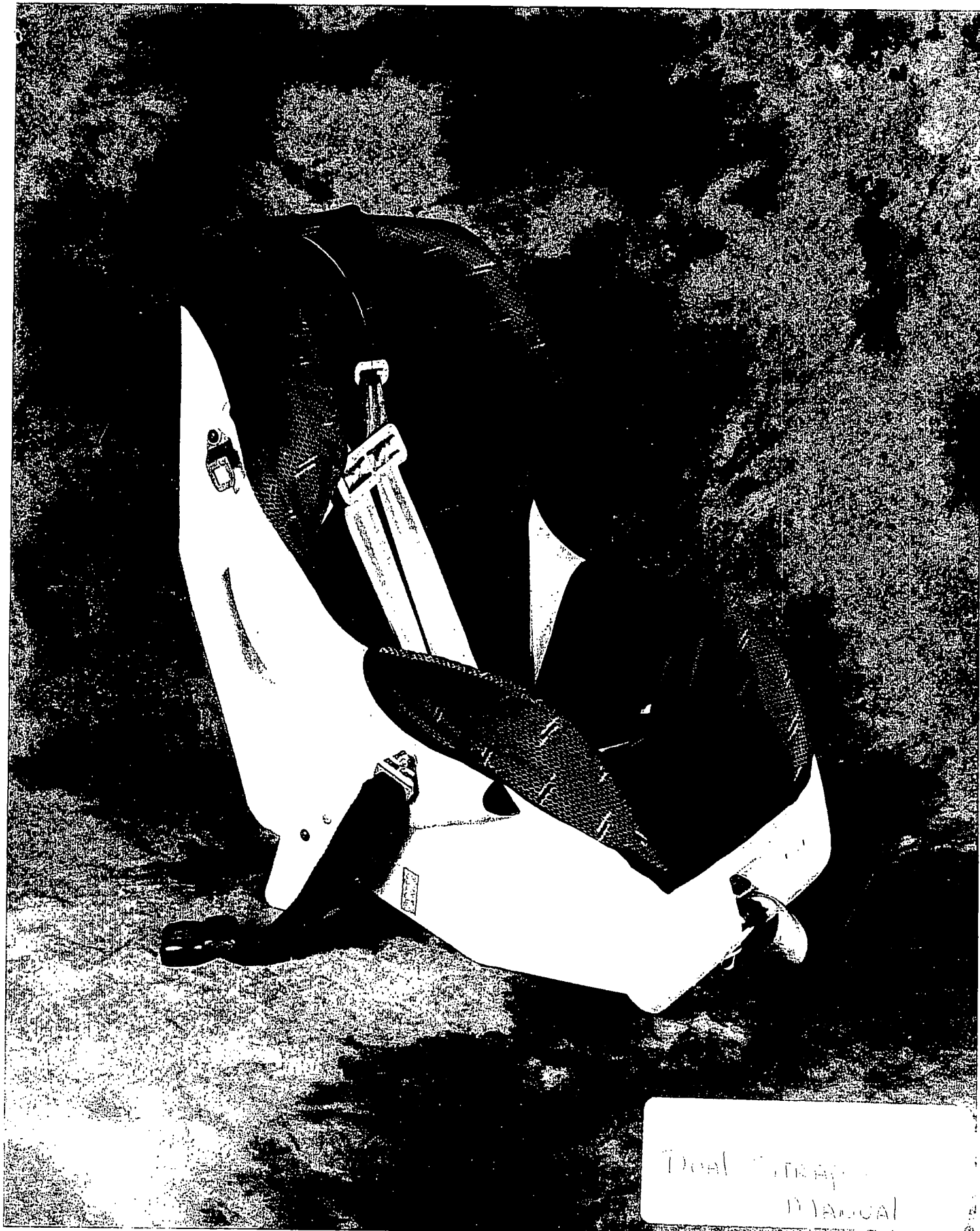
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CRS Rigid	\$33.87 - \$43.87	\$2.82 to \$6.62	\$217 - \$256 Million
CRS Nonrigid	\$9.62 - \$21.09	\$2.82 to \$6.62	\$123 - \$167 Million

* The range represents vehicles with no rear seat (meaning anchorage required for one front seat) to vehicles with two or three rear seating positions (meaning two seating positions with lower anchorages and tether plus one seating position with just a tether).

BENEFIT-COSTS PER EQUIVALENT FATALITY

CRS	Fatality Benefits*	Injury Benefits	Cost per Equivalent Fatality (Millions)
Rigid	29 to 46	7,234 to 19,209	\$0.72 to \$1.26
Nonrigid	34 to 48	7,553 to 19,308	\$0.61 to \$1.04

- *1) Estimated lives lost by misuse is 68, of which 34 could be affected by this rule.
2) Most of the remaining 34 are from not properly securing child to child restraint.
3) 6 to 18 lives saved (Increased effectiveness of new system) + 23 to 28 lives saved rigid and 28 to 30 non-rigid (Elimination of misuse).



Tonal Straps
MANUAL



MEASUREMENT