

## Proposed NHTSA “Seat Fit” Program: Sounds Promising, but can Drawbacks be Avoided?

For the last several years, Nissan has been the model for evaluating the compatibility of CRs in particular vehicles through its program called “Snug Kids.” Now NHTSA has developed a plan for other vehicle manufacturers to voluntarily assess and recommend at least three current CR models in each category (RF, FF, and booster) for use in their current vehicles. The agency would then publish listings at [www.safercar.gov](http://www.safercar.gov) and periodically spot-check them for accuracy.

In its response to the NHTSA program plan, Safe Ride News Publications has applauded the effort and commented about several aspects. The full proposal can be found at [www.regulations.gov](http://www.regulations.gov) (search for Docket NHTSA–2010–00062.)

In an *SRN* editorial in December 2004, I called for a usability rating system for vehicle LATCH anchors, so we welcome a program that will encourage vehicle and CR designs that are more compatible. The proposed evaluation plan does focus on the problems that we have found informally during work with real car seats and vehicles. Over time, this sort of program is likely to improve the explicitness of vehicle and CR instructions and also allow design teams from both sets of manufacturers to focus better on reducing incompatibilities in both types of products.

We do have a few concerns with the proposed plan, however.

- We worry about possible competitive issues in the CR market if a major vehicle manufacturer were to naturally gravitate toward considering only CRs from the major CR makers and inadvertently skew designs so that products of smaller or new companies would find it very difficult to stay or get into the market.
- We ask whether any aspects of the evaluation would stifle innovation, such as the cut-off for tether anchor weight limits at 40 pounds, which in itself we find questionable. The requirement that unregulated, optional features, such as rear-facing tethers, must work in all vehicle positions in order for the CR model to be listed may provide a disincentive for including such enhancements on CRs.
- We are concerned that requiring vehicle manufacturers to list at least three CR models of each type in order to participate could distort the intent of the program by failing to reveal the one or two models that might fit well in a particularly difficult vehicle. There needs to be a way to incorporate this information, since most parents/caregivers are unlikely to buy a different car, at least in the short term, to improve compatibility.
- Under the proposed voluntary plan, consumers would have no way of knowing whether an unlisted vehicle was simply not included in the compatibility evaluation or whether no (or only one or two) CRs had been found that would fit. As part of this problem, there also would be no way to know how many CRs actually were tried in the process of finding compatible models. On one hand, perhaps many were tried but only a few worked well, or, on the other, perhaps many CRs would fit but only a few needed to be listed.

Enough said! The plan appears to be promising, but it is likely to have a number of changes before it is ready for prime time. Our complete response is posted with all other comments at [www.regulations.gov](http://www.regulations.gov), and will also be posted on our website, [www.saferidenews.com](http://www.saferidenews.com).

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