



September 21, 2018

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Room W12-140
Washington, DC 20590

**Comments of Consumer Reports on the
National Highway Traffic Safety Administration Request for Comments on the
Proposed Renewal of Agency Information Collection Activities;
National Survey of the Use of Booster Seats
Docket No. DOT-NHTSA-2018-0075**

Consumer Reports (CR), the independent, non-profit member organization that works side by side with consumers for truth, transparency, and fairness in the marketplace,¹ welcomes the opportunity to submit comments to the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) regarding the agency's intention to request Office of Management and Budget renewal of an approved information collection pertaining to the National Survey of the Use of Booster Seats (NSUBS). CR supports extension of this information collection, which is due to expire in May 2019, and offers several additional comments.

NSUBS advances the interests of consumers and NHTSA's safety mission. CR relies on data supplied by this survey and others to assess real-world use of booster seats and child seats in motor vehicles. This analysis, in turn, helps CR prioritize topics to include in our published content, product testing, and ratings, and also helps us develop related and broader educational content related to child passenger safety.

In recent years, child seat laws for many states have changed to include requirements for booster seat use that were not included previously. Similar policies requiring use of harnesses have been shown to improve use rates for those seats. It would be prudent for NHTSA to continue to collect data to verify whether new provisions in state laws are proving effective in improving child passenger safety and booster seat use rates.

NHTSA's focus on booster seat use is especially critical at the present moment, because rates of use are far too low and appear to be remaining flat over time. While use rates are relatively high for infant and toddler child seats — 87.4% for rear-facing seats for kids age 1 and under, and 77% combined for rear-facing and forward-facing car seats for kids age 3 and under — use rates for booster

¹ Founded in 1936, CR has the largest nonprofit educational and consumer product testing center in the world, and uses its dozens of labs, auto test center, and survey research center to rate thousands of products and services annually. CR's premier magazine Consumer Reports has more than 3.6 million subscribers, and the award-winning CR.org has 2.9 million paying members and more than 15 million unique visitors monthly, on average.

seats among 4-year-olds through 7-year-olds remain much lower. According to the most recent NSUBS data available, in 2015, booster seat use at these ages was 44.5%, with an increase in children potentially graduated prematurely to built-in vehicle seat belts that are engineered for older youth and adults. This reflects no statistically significant change from the 2013 NSUBS results, which found that 46.3% of children in the age 4-7 group were secured in a booster seat.²

Clearly, with booster seat use flat, at best, between 2013 and 2015, not enough is being done to ensure parents and caregivers know when and how to use these products — with potentially serious implications for child passenger safety. As with adults, children’s restraint use considerably reduces the risk of fatal injury. However, according to NHTSA’s research into fatal incidents, there appears to be a significant disparity in restraint use between younger children and their older counterparts. For instance, of the 165 children age 3 or under killed in crashes in 2016, around eight in ten were known to be restrained. By contrast, of the 263 children killed who were in the 4-7 and 8-12 age groups — which includes the overwhelming majority of booster-aged children — around six in ten of those age 4-7 and around just five in ten of those age 8-12 were known to be restrained.³

These statistics highlight the continued need for better education and public awareness about the benefits of booster seats and their potential for reducing injuries and fatalities among booster-aged children. NSUBS data forms a critical foundation for these efforts, whether they are undertaken by NHTSA, CR, or by other highway safety and public health organizations. Furthermore, the NSUBS results are particularly valuable because they include trends in child restraint use based on child age, race and ethnicity, gender, and the presence of other, non-child vehicle occupants — all of which help determine what kinds of educational campaigns and child safety resources may prove most beneficial.

It is for these reasons that Consumer Reports strongly supports extension of the approval of NHTSA’s information collection regarding NSUBS, the essential survey on booster seat use among children in motor vehicles. We urge the Office of Management of Budget to grant NHTSA’s request for approval without delay.

Respectfully submitted,

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² NHTSA, “The 2015 National Survey of the Use of Booster Seats,” DOT HS 812 309 (Sept. 2016) (online at crashstats.nhtsa.dot.gov/api/public/viewpublication/812309).

³ NHTSA, “Traffic Safety Facts - 2016 Data - Children,” DOT HS 812 491 (Apr. 2018) (online at crashstats.nhtsa.dot.gov/Api/Public/Publication/812491).

⁴ Consumers Union is the advocacy division of Consumer Reports.