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U.S. Department of Transportation
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**Comments of Consumer Reports to the
National Highway Traffic Safety Administration on the
Notice of Proposed Rulemaking; Federal Motor Vehicle Safety Standards:
Occupant Crash Protection, Seat Belt Reminder Systems
Docket No. NHTSA-2023-0032**

Consumer Reports (CR), the independent, nonprofit member organization,¹ welcomes the opportunity to comment on the notice of proposed rulemaking (NPRM) by the U.S. Department of Transportation’s National Highway Traffic Safety Administration (NHTSA) to update requirements for seat belt reminder systems, including by requiring a seat belt warning system for rear seats.

The body of evidence, including the evidence summarized by NHTSA in the NPRM, clearly demonstrates that seat belt use saves lives.² As noted by the agency, unbuckled occupants continue to be overrepresented in fatal crashes.³ The Insurance Institute for Highway Safety (IIHS) estimates that if all vehicles had persistent reminders to buckle up, it would save approximately 1,500 lives annually.⁴ In spite of the documented effectiveness of seat belts and seat belt warning systems (SBWS), and existing technology that has the potential to substantially

¹ Founded in 1936, Consumer Reports (CR) is an independent, nonprofit, and nonpartisan organization that works with consumers to create a fair and just marketplace. Known for its rigorous testing and ratings of products, CR advocates for laws and company practices that put consumers first. CR is dedicated to amplifying the voices of consumers to promote safety, digital rights, financial fairness, and sustainability. The organization surveys millions of Americans every year, reports extensively on the challenges and opportunities for today's consumers, and provides ad-free content and tools to 6 million members across the United States.

² Federal Register, “Federal Motor Vehicle Safety Standards: Occupant Crash Protection, Seat Belt Reminder Systems” (Sept. 7, 2023) (online at: www.federalregister.gov/documents/2023/09/07/2023-18413/federal-motor-vehicle-safety-standards-occupant-crash-protection-seat-belt-reminder-systems).

³ *Id.* at 61682.

⁴ IIHS, “IIHS welcomes proposal to strengthen seat belt reminder requirements” (Aug. 22, 2023) (online at: www.iihs.org/news/detail/iihs-welcomes-proposal-to-strengthen-seat-belt-reminder-requirements?mc_cid=31411af487&mc_eid=2169c10a85).

increase rear seat belt use, most new vehicles still do not come equipped with a rear seat belt warning system, despite seat belt usage rates among rear seat passengers lagging substantially behind front seat belt use.

While Consumer Reports welcomes the publication of this proposed rule, we are concerned that it does not go nearly far enough to incentivize seat belt use by rear seat passengers. Specifically, the proposed rule does not mandate that vehicles must comply with the “full-status” compliance option, which would require the system to indicate, for the occupied rear seats, how many or which rear seat belts are in use and how many or which rear seat belts are not in use, which in turn would require that rear seats be equipped with a belt latch sensor and an occupant detection system. The technology required to implement occupant detection in rear seating positions is already widely available, and the agency should strengthen the proposed requirements to require it. The proposed effective dates should also be earlier than those currently proposed, as manufacturers have shown that they—in response to independent non-profit ratings—can make improvements like the ones proposed in a much swifter time frame.

In the following sections, we share CR’s comments on information related to seat belt reminder systems that has been requested by the agency. We also offer comments on specific areas where the proposed rule should be strengthened to better serve consumers. We urge NHTSA to seize this opportunity by moving forward expeditiously and issuing a final rule for seat belt reminder systems that is stronger than its proposal.

I. Rear Seat Reminder Requirements

Rear seat belt use continues to lag substantially compared to the use of seat belts in the front seat. While NHTSA acknowledges this lag, the proposed seat belt reminder requirements for rear seats do not reflect the scale of this dangerous reality, and do not go nearly far enough to address this stark gap in use that continues to leave rear seat passengers at an elevated risk of injury or death. Simply put, seat belts are the best line of defense to reduce injuries and deaths to occupants. Moreover, the safety benefits of advanced seat belt features that are available in current model vehicles, such as pretensioners and force limiters, cannot be realized if seat belts are not in use. These advanced features will be essential to reducing the incidence and severity of crash injuries in the future.

Buckle-Up Reminder: Start-Up Reminder Should Include An Audible Warning on Start-Up

CR agrees with NHTSA that the proposed visual warning should last at least 60 seconds if a seat belt remains unbuckled. However, an audible warning should similarly last at least 60 seconds if a seat belt remains unbuckled, because as NHTSA notes, warnings with an audible component are generally more effective.⁵ Compared to bimodal warning systems, visual-only warnings can more easily be ignored or unintentionally missed.

Concerningly, rear seat belt use has remained significantly lower than front seat belt use since 2012. In 2021, front seat belt use was 90.4%, while rear seat belt use was 77.9%.⁶ It is

⁵ *Supra* note 2 at 61691.

⁶ *Supra* note 2 at 61680.

imperative that NHTSA strive to close this gap, and do so by making rear seat warnings as rigorous as front seat warnings. Requiring an audible component to the rear seat start-up warning would also make start-up warnings more consistent throughout a vehicle, regardless of the seating position.

We therefore strongly encourage NHTSA to require a robust rear seat audible warning on startup. Further, to help communicate urgency to drivers and passengers, audible warnings should escalate throughout the duration of the reminder. If a rear SBWS does not sufficiently incentivize rear seat belt use at the beginning of all trips, the need for and efficacy of unbuckled alerts is severely diminished.

The agency notes that requiring an audio-visual warning would necessitate requiring occupant detection because “false positives” would particularly annoy the driver and could decrease the effectiveness of the warning.⁷ To ensure that warning systems are as effective as possible, occupant detection should indeed be required. Occupant detection is increasingly a fundamental part of safety in a vehicle. Advanced occupant detection systems also have the ability to differentiate human occupants from other inanimate objects to reduce the false activation of belt minders when they are not needed. Through widespread implementation, drivers and passengers have grown accustomed to audible buckle-up warnings for front seat belts. It therefore is plausible to conclude that audible warnings for rear seat passengers would likewise be widely accepted by consumers.

Proposed Rear SBWS Compliance Options

With regard to the three proposed compliance options from which manufacturers can choose for implementing a rear seat belt warning system, CR strongly urges NHTSA to require the third option, the full-status option, on all new vehicles under the scope of the proposed rule. Requiring the full-status option would require the system to indicate, for the occupied rear seats, how many or which rear seat belts are in use and how many or which rear seat belts are not in use, which in turn would require that rear seats be equipped with a belt latch sensor and occupant detection.

We find both the “positive-only” and “negative-only” compliance options insufficient to incentivize rear seat belt use. While the positive-only option would be the least technically complex, it would also be the least effective type of warning system. We urge the agency to reconsider permitting this departure from Euro NCAP, which requires that systems without occupant detection show both the rear seat belts in use and those not in use. Because NHTSA is proposing only to require a visual signal upon startup, and the positive-only compliance option would not permit a visual signal for an unfastened seat belt,⁸ it is insufficient to incentivize seat belt use at the beginning of a trip, as well as to prompt a passenger to buckle up if they become unbuckled during a trip. Further, the positive-only option—which would require only that seat belts be equipped with a belt latch sensor—would require a driver to determine how many rear seat occupants are present for each trip, then compare that number, or the location of occupants, and fastened belts to determine if that number equals the number of seat belts that are reported

⁷ *Supra* note 2 at 61691.

⁸ *Id.*

by the warning system as buckled. This creates unnecessary mental work for the driver, allows room for human error, and creates a barrier to useful information, particularly for drivers that routinely have varying numbers of rear seat passengers.

The negative-only compliance option and the full-status option both require that rear seats be equipped with a belt latch sensor and an occupant detection system. Given this overlap in requirements, the negative-only option seems unnecessary. We recommend that it be eliminated as a compliance option, as, by comparison, the full-status option provides additional information to the driver to address belt non-use without the need for additional technology.

The requirement for a system that provides both start-of-trip buckle-up alerts and unbuckled alerts is consistent with how CR scores rear seat belt reminders as part of our rear seat safety score for the vehicles we test and evaluate. CR strongly encourages NHTSA to further align with the Economic Commission for Europe (ECE) Regulation R16 by requiring that visual warnings indicate all rear seating positions. Although a seating map may require a somewhat more sophisticated display, it is preferable because it offers the driver complete information while facing forward. Within a seating map, easily recognizable icons are preferable to text, as icons enable a driver to assess seating usage at a quick glance, without having to read. Easily recognizable icons are also useful for drivers for whom English is not a first language.

Audio-Visual Change-of-Status Warning

We find the proposed duration of the audio-visual reminder that activates when a rear seat belt is unfastened while a vehicle's ignition switch is in the "on" or "start" position to be inadequate in its proposed duration of 30 seconds. For consistency with the proposed start-up visual reminder requirement, the change-of-status visual warning should last for at least 60 seconds unless the seat belt is buckled. An audio-visual change-of-status warning would be beneficial to a driver whether or not a vehicle is not in motion, and we agree with the agency's proposed departure from ECE R16 and Euro NCAP on this matter. A stopped vehicle presents the best opportunity for a driver—who serves as the responsible party for those riding in their vehicle, especially child passengers—to correct the problem before the vehicle is in motion, rather than having to temporarily depart from their route or try to address the situation while driving. We agree with the agency's decision to require the change-of-status warning to include both audible and visual components, and urge NHTSA to require the same for the start-up warning.

Permitting Acknowledgement and Deactivation

While granting a driver the ability to deactivate a seat belt warning system for a period longer than the duration of a current trip could pose potential safety issues, CR finds it reasonable to allow drivers to "acknowledge and dismiss" these warnings on a trip-by-trip basis. For example, if a driver drops off a rear seat passenger, and the system recognizes then that a passenger has become unbuckled, the system should allow a driver to acknowledge the warning, and dismiss alerts only for that trip. Additionally, there are other scenarios in which an unbuckled alert may be triggered, including accidentally using the wrong buckle and changing seating positions. Our comments on this matter are consistent with how CR evaluates and scores

seat belt reminder systems as part of our rear seat safety scoring. Under the rear occupant protection category of our rear-seat safety features score, when CR evaluates the performance of rear seat belt reminders, we award points if a driver has the ability to acknowledge and dismiss an unbuckled status alert.⁹ Acknowledgement and dismissal are excellent ways of retaining the value of the system while also maintaining consumer acceptance for scenarios drivers know are safe.

Use and Consumer Acceptance of Rear Seat Belt Warning Systems

NHTSA notes, despite the introduction of rear seat belt warning systems well over a decade ago, only 46.9% of vehicles come equipped with a rear seat belt warning system.¹⁰ These findings are consistent with the results of a nationally representative survey of 2,089 U.S. adults that Consumer Reports conducted in September 2023, which found that 47% of American drivers say they have a rear seat belt reminder in a vehicle they drive regularly. Among drivers who stated that they have a rear seat belt reminder system and drive with people in the back seat, 90% said the reminder makes them more aware of whether rear seat passengers are wearing seat belts. Of those who said the alert makes them more aware of rear passengers' seat belt use, 82% said that it makes them more likely to ask at least some passengers—adults, children, or both—to buckle up. In that same group—those who said the alert makes them more aware of seat belt use—only around one in ten of those who drive children (10%) or adults (12%) say that passengers in that group buckle up on their own, without being asked, though this could be because they are being asked preemptively by the drivers.¹¹ These findings help demonstrate that rear seat belt reminders can help increase rear seat belt use.

Technological and Economic Feasibility

We agree with NHTSA that the proposed requirements are both technologically and economically practicable, but CR is concerned that they require too little of automakers to effectively address non-use of seat belts in the rear seat.

Exemptions

CR agrees with NHTSA's tentative decision to harmonize with ECE R16 by not exempting removable, folding, rotating, or stowable seats from the proposed requirements. We agree with the agency that removable seats must either automatically connect the electrical connections when the seat is put in place or, if a manual connection is required, the connectors should be readily accessible.

⁹ CR, "Rear Seat Safety: Features Scoring Rubric" (Updated Oct. 2022) (online at: data.consumerreports.org/reports/rear-seat-safety-features-scoring-rubric).

¹⁰ *Supra* note 2 at 61718.

¹¹ CR, Nationally Representative American Experiences Survey of 2,089 U.S. Adults (Sept. 2023) (online at: article.images.consumerreports.org/image/upload/v1696262259/prod/content/dam/surveys/Consumer_Reports_AES_Toplines_September_2023.pdf).

II. Warning Requirements for Front Outboard Passenger Seats

Most manufacturers already implement audible warnings for front outboard passenger seats that last more than eight seconds,¹² and we agree with NHTSA’s decision to update the proposed requirements to reflect marketplace changes that have resulted in more substantial audible warnings. CR is glad to see NHTSA propose to require an audio-visual warning on vehicle start-up until the last belts of any occupied front outboard seats are fastened, as well as an audio-visual change-of-status warning for any front outboard seat that would also last until the seat belt is refastened. For both front outboard and rear seat passengers, it is important for these warnings to escalate if a seat belt is not fastened.

While we agree with NHTSA’s decision to align with Euro NCAP and require an occupant detection system for front outboard passenger seats, NHTSA notes that occupant detection is already widely deployed in these seats, either as part of an advanced airbag system or as part of a voluntarily-provided seat belt warning system,¹³ reinforcing the feasibility of equipping vehicles with occupant detection technology. In contrast, only a small percentage of rear seats are equipped with occupant detection, despite lower rates of seat belt use in rear seats. We strongly urge NHTSA to require occupant detection not just for front outboard passenger seats, but also for all rear seating positions.

III. Seat Occupancy Criteria and Interaction with Child Restraint System

We agree with NHTSA on the importance of testing the lower end of the possible weight range that encompasses children that could conceivably be restrained with a seat belt alone. However, while the agency proposes that an occupied rear seating position would be considered “occupied” when an occupant weighs at least 46.5 pounds—the testing criteria for which is the 6-year-old anthropomorphic test device (ATD or dummy)—we consider this dummy insufficient to account for protecting four- and five-year-olds who may be in booster seats.

NHTSA claims that it would be inappropriate to specify the use of the 36-pound Hybrid III 3-year-old dummy because a child represented by this ATD should be seated in a forward-or rear-facing child restraint system (CRS), not a booster seat.¹⁴ While we agree with NHTSA on the appropriate age range for use of CRSs, we also recognize that, in reality, children under the recommended weight and height threshold may be prematurely placed in booster seats, which is why the Hybrid III 3-year-old dummy would better protect these children than the 6-year-old dummy. Doing so is important to capture the lower end of the spectrum, which NHTSA identifies as a four-year-old. According to CDC growth charts,¹⁵ the average weight of a four-year-old in the U.S. is just under 40 pounds for both boys and girls, which would be best represented by the 3-year-old dummy. Common booster seat specifications indicate age four as the minimum threshold for booster seat use.

¹² *Supra* note 2 at 61710.

¹³ *Supra* note 2 at 61708.

¹⁴ *Supra* note 2 at 61694.

¹⁵ CDC, “Clinical Growth Charts” (Last reviewed June 16, 2017) (online at: www.cdc.gov/growthcharts/clinical_charts.htm#Set1)

At the same time, based on our understanding of current vehicle-integrated sensor technology, the ability to detect occupants smaller than the 5th percentile female is limited. Therefore, while we applaud NHTSA's desire to more comprehensively account for the real-world populations utilizing rear seat belts, it appears premature to require the detection of smaller dummies. We recommend that NHTSA incorporate detection of dummies smaller than the 5th percentile female into New Car Assessment Program (NCAP) ratings for rear seat belt reminders, which would award manufacturers for going above and beyond the regulatory minimum and drive safety innovation.

Ability of System to Detect CRS: No Proposed Requirement Capabilities

NHTSA does not believe a CRS installed with LATCH would cause false warnings. In CR's experience testing rear seat belt reminder systems, we have evaluated systems equipped with occupant detection by way of pressure sensors in the seat cushion. These sensors would still be triggered by a CRS installed with LATCH. Although the vehicle owner's manual often recommends buckling the unused seat belt behind the CRS, vehicle owners often do not read the owner's manual, or simply do not comply with this recommendation. We are aware that there are occupant detection systems that utilize multiple types of sensors and are therefore able to even detect the presence of a CRS and incorporate that data point into their alert logic. These systems are not yet implemented in production vehicles, however. Therefore, we recommend that NHTSA not yet make CRS detection part of the proposed requirement. Consumers might be better served by incorporating CRS detection into a component of NCAP for rear seat belt reminder systems, as discussed above, to help drive safety innovation going forward.

IV. Regulatory Alternatives and Closing Regulatory Gaps

Occupant Detection and Enhanced Warning Signals for the Rear Seat Belt Warning

Based on our vehicle evaluations and comparisons of standard vehicle equipment across international markets, Consumer Reports does not find that occupant detection poses unreasonable technical challenges to manufacturers. Additionally, as rear seat safety technology continues to evolve, occupant detection systems could be utilized for multiple safety benefits such as rear occupant alerts for vehicular heatstroke prevention and airbag suppression. As NHTSA acknowledges, most of the components necessary to meet the proposed minimum performance requirements for a system with occupant detection are readily available.¹⁶ NHTSA estimates that occupant detection components cost \$39.75 per vehicle. Combined with the \$19.59 per vehicle cost of the buckle sensor, the warning system is estimated to cost \$59.33 per vehicle.¹⁷ This total does not add a significant amount to a vehicle's overall cost, yet may yield substantial benefits exceeding those quantified by NHTSA, and therefore CR strongly urges NHTSA to proceed with the occupant detection and enhanced warning signals regulatory alternative for rear seats.

Citing uncertainty in how much more effective SBWS with occupant detection would be in increasing seat belt use compared to the already estimated increase without occupant

¹⁶ *Supra* note 2 at 61719.

¹⁷ *Supra* note 2 at 61694.

detection, NHTSA did not conduct a cost-effectiveness and net benefits analysis of SBWS with occupant detection. However, research related to increased driver's seat belt warnings that include a "long-lasting audible signal" indicate that belt use would substantially increase,¹⁸ underscoring the importance of a comprehensive cost-effectiveness analysis. Further, the benefits of unbuckled alerts can only be fully realized if the alerts adequately incentivize the use of seat belts at the beginning of a trip. Advanced seat belt designs, including load limiters and pretensioners, have injury as well as fatality benefits, but they can only be realized if passengers are incentivized to buckle up at the start of a trip, and remain buckled for the duration of a trip.

Non-Regulatory Alternatives

We agree with NHTSA's decision to not pursue either of the non-regulatory alternatives presented in the ANPRM. The agency's proposed requirements for front outboard warning requirements are more practical.

Closing the Current Gap for Driver's Seat Belt Warning in Medium-sized Buses

Consumer Reports supports NHTSA's efforts to close this regulatory gap. We also urge the agency to close any other safety gaps in regulations that may exist.

V. NHTSA's Cost-Benefit Analysis Likely Underestimates Safety Benefits

We find the estimated benefits of the proposed rule to be undervalued, particularly as they relate to rear seat passengers and warning systems. NHTSA calculated net benefits of rear SBWS using the positive-only rear SBWS option. Using the positive-only option, NHTSA estimates a cost of \$6.28 per seat, with an average of 3.12 rear seats per vehicle, final cost is \$19.59 per vehicle.

NHTSA's analysis does not factor in the technological advancements of current vehicle fleets, including seat belts with load limiters and pretensioners, and crash avoidance systems such as automatic emergency (AEB) braking systems. These crash avoidance technologies are associated with hard braking and pre-crash evasive maneuvers.

Such technology will continue to advance and become more ubiquitous on U.S. roads. As a result, continuing to have unrestrained passengers will likely increase the rate of injury for rear seat passengers. Further, the estimated net benefits of the proposed rule would likely be greater if NHTSA required the full-status compliance option on all vehicles within the scope of the proposed rule.

NHTSA estimates the proposed requirements could lead to an increase in rear seat usage from 3.4% to 5.1% points for passengers aged 11 and older, and smaller increases for younger

¹⁸ David G. Kidd and Sean O'Malley of IIHS, "Increasing seat belt use in the United States by promoting and requiring more effective seat belt reminder systems" (June 2, 2023) (online at: www.pubmed.ncbi.nlm.nih.gov/37267012/#:~:text=More%20persistent%20reminders%2C%20like%20those,do%20not%20routinely%20buckle%20up)

passengers [0.27 to 0.41% points]).¹⁹ However, the projected increases in belt use would likely be greater if NHTSA required the full-status compliance option for all applicable vehicles.

The estimated benefits of the proposed rule do not account for manufacturers that would choose to implement negative-only or full-status warning systems. It is foreseeable that some automakers would choose to do so. Therefore, when calculating benefits, NHTSA should account for that scenario.

Adjusting for future decreases in injuries and fatalities due to the introduction of other mandatory safety technologies, in the absence of the proposed requirements, NHTSA estimates there would be 475 fatalities and 7,036 injuries to unrestrained rear seat occupants each year. However, these decreases will not be fully realized unless occupants are buckled. Further, if NHTSA has not done so, the agency should consider accounting for higher numbers of rear seat passengers resulting from consumers increasingly using ride sharing services in recent years.²⁰

Full-status SBWS will be a foundational building block for future novel seating configurations as the vehicle fleet becomes more autonomous. Ultimately we will have adults and children potentially sitting anywhere in the vehicle and need them to be belted for maximum occupant protection.

Net benefits of Front Outboard SBWS

NHTSA estimates the cost for equipping a front outboard passenger seat with a SBWS is about \$2.13 per vehicle. While current seat belt use rates are markedly higher for front seated occupants, NHTSA's estimated costs fail to consider the potential injuries caused to front seated passengers that would result from unrestrained rear seat passengers whose forward motion during a crash, hard braking and pre-crash evasive maneuvers may cause additional injury to front seated occupants.

Alternative Way to Measure Estimated Benefits

NHTSA notes that an alternative way to measure benefits, which the agency did not pursue, is by calculating equivalent lives saved (ELS). While CR does not find that measuring benefits this way is necessary, it is important for NHTSA to recognize that these analytical tools can be helpful to the agency's understanding of how to maximize benefits for the public. However, such tools should not serve as a barrier to NHTSA implementing strong safety to help reduce preventable deaths and injuries on U.S. roads.

¹⁹ *Supra* note 2 at 61722.

²⁰ Zippia, "20+ Riveting ridesharing industry statistics [2023]: Average Ridesharing Revenue, Market Share and more" (June 19, 2023) (online at: www.zippia.com/advice/ridesharing-industry-statistics/#:~:text=As%20of%202022%2C%20Uber%20has,%25%20year%2Dover%2Dyear)

VI. Proposed Effective Dates

In 2012, Congress mandated that NHTSA initiate a rulemaking by 2014 to provide a seat belt warning system for rear seating positions, and issue a final rule by 2015.²¹ Four years later, in 2019, NHTSA published the Advance Notice of Proposed Rulemaking (ANPRM) for seat belt reminder systems. Given that this proposed rulemaking was over four years in the making, the NPRM's proposed mandates should require quicker action by auto manufacturers.

CR agrees with IIHS's assertion that "NHTSA's proposed implementation delays of at least one year for the front seat and two years for rear seats are unnecessary. Manufacturers have shown they can make these improvements quickly in response to our ratings."²² CR has likewise seen manufacturers demonstrate that they are capable of quickly implementing lifesaving technologies as standard equipment in a variety of crash avoidance and occupant protection areas in response to our auto safety ratings. We recommend that NHTSA require implementation of all new requirements under this rule no later than the first September 1 that is one year after the publication of the final rule, with optional early compliance permitted.

VII. Conclusion

Consumer Reports thanks NHTSA for the publication of this proposed rule. We urge NHTSA and the Department of Transportation to make the final rule as ambitious as possible in order to maximize lives saved and injuries prevented on our roads. The agency would significantly strengthen this rule by requiring vehicles to comply with the full-status option for rear seat belt reminder systems, and by requiring swifter implementation of the new requirements.

This rulemaking presents an opportunity for NHTSA to significantly raise the bar on safety and require manufacturers to make rear seat belt reminder alerts as rigorous as front seat belt reminder alerts. Doing so would be an important step in helping to close the seat belt usage gap that exists between the front and rear seat. Seat belts are every occupant's first line of defense in a crash and NHTSA should require automakers to make every effort to promote their use.

CR's recent nationally representative survey results demonstrate that for an overwhelming majority of Americans who have a rear seat belt reminder system and regularly drive people in the back seat, the system makes them more aware of whether rear seat passengers are wearing seat belts. Of those Americans, a large majority, specifically 82%, report that the system makes them more likely to ask at least some kinds of passengers to buckle up.²³ If NHTSA's SBWS requirements are adequately strong, and require all vehicles within the scope of the rule to come equipped with a full-status seat belt reminder, it is likely that there would be a

²¹ "Motor Vehicle and Highway Safety Improvement Act of 2012, Sec. 31503. Rear Seat Belt Reminders" (online at: www.govinfo.gov/content/pkg/BILLS-112hr4348enr/pdf/BILLS-112hr4348enr.pdf)

²² *Supra* note 4.

²³ CR, Nationally Representative American Experiences Survey of 2,089 U.S. Adults (Sept. 2023) (online at: article.images.consumerreports.org/image/upload/v1696262259/prod/content/dam/surveys/Consumer_Reports_AES_Toplines_September_2023.pdf).

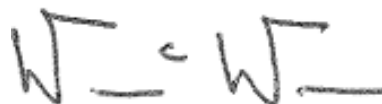
greater increase in the number of rear seat passengers who will buckle up compared to NHTSA's projected increases.

CR thanks NHTSA again for the opportunity to comment, and looks forward to seeing a strong final rule finalized as expeditiously as possible.

Respectfully submitted,



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