August 24, 2010

The Honorable David Strickland
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Request for Comments; Federal Motor Vehicle Safety Standards, Occupant Crash Protection; Docket No. NHTSA-2010-0061

Dear Administrator Strickland:

The National Highway Traffic Safety Administration (NHTSA) has requested comments on a petition by Public Citizen and Advocates for Highway and Auto Safety asking NHTSA to require seat belt reminder systems for rear designated seating positions. The Insurance Institute for Highway Safety (IIHS) supports the use of reminder systems for rear seats.

Seat belt use in the United States has increased to almost 85 percent during recent years, but the need for increased belt use still is evident. Rear seat belt use was observed at only 74 percent in 2008, the same year in which 54 percent of all fatally injured passengers, including rear passengers, were not using seat belts. IIHS research has found that enhanced seat belt reminder systems reduce driver fatality risk by 2 percent (Farmer and Wells, 2010). This is in line with NHTSA’s own research showing that these enhanced systems increase belt use by drivers and front seat passengers by 3 percent (NHTSA, 2007).

IIHS recognizes there is no evidence that the minimal reminder systems required by Federal Motor Vehicle Safety Standard (FMVSS) 208 have had any benefit on seat belt use. However, as mentioned above, there are documented benefits to enhanced reminders and, although NHTSA cannot require them, automakers nevertheless have been installing enhanced reminders for driver and front passenger positions in newer vehicles. By requiring automakers to install the minimal FMVSS 208 reminders for rear seating positions, there is increased likelihood these enhanced systems will be applied to rear seats.

The importance of seat belt use is self-evident, and any system that can increase such use, regardless of seating position, likely will benefit public safety. IIHS therefore supports the requirement of reminder systems for rear seating positions and requests that NHTSA move forward with rulemaking.

Sincerely,

Joseph M. Nolan
Chief Administrative Officer and Vice President, Vehicle Research

References
