

INSURANCE INSTITUTE FOR HIGHWAY SAFETY

August 22, 2005

The Honorable Jeffrey W. Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

**Federal Motor Vehicle Safety Standards;
Designated Seating Positions and Seat Belt Assembly Anchorages
Docket No. NHTSA-2005-21600**

Dear Dr. Runge:

The Insurance Institute for Highway Safety supports the proposal by the National Highway Traffic Safety Administration (NHTSA) to amend the definition of "designated seating position" (DSP) in federal motor vehicle safety standards and to establish a new procedure for determining the number of designated vehicle seating positions. We also support NHTSA's proposal to apply the new procedure to all types of vehicles, irrespective of weight, and to eliminate the current exception for auxiliary seats. The Institute favors the proposed changes because the new definition and procedure would require all vehicles to have sufficient numbers of restraint systems to protect the number of occupants who actually can be seated.

We agree with the agency that the current definition of "designated seating position" is too vague and too dependent on manufacturers' designations to reflect real occupancy of modern vehicles. NHTSA's examples of vehicles with two rear DSPs being occupied by three passengers reflect our own observations. The proposed use of the H-point instead of the seating reference point, along with the clearer definition of seating impediments that may be used to separate adjacent DSPs, should provide vehicle manufacturers with better guidance on the number of seat belts that need to be fitted. In addition, the amendment of the DSP definition to remove the exclusion for auxiliary seats fills a long overlooked gap in safety standard requirements to provide belts in positions likely to be occupied when a vehicle is in motion.

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The Institute supports the new definition and procedure for determining a designated seating position, applicable to all vehicles, because it would require each location capable of passenger occupancy to be equipped with a restraint system.

Sincerely,

A handwritten signature in black ink, appearing to read "Adrian K. Lund", is written over a vertical red line.

Adrian K. Lund, Ph.D.
Chief Operating Officer

cc: Docket Clerk, Docket No. NHTSA-2005-21600