

JUL 2 2003

Daniel P. Malone  
Butzel Long  
150 W. Jefferson Ave.  
Suite 900  
Detroit, MI 48226

Dear Mr. Malone:

This is in reply to your e-mail of June 20, 2003, to Taylor Vinson of this Office, asking about the early warning reporting (EWR) responsibilities of seat manufacturers that supply integrated child seat systems.

Your question arises from a statement in the preamble to the EWR final rule, which remarked:

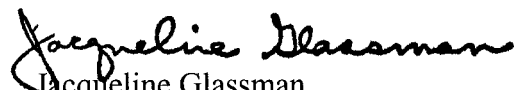
“In the final rule, we have decided to reduce the burden upon light vehicle manufacturers by not requiring separate reports involving integrated child seat systems (which are now included in the definition of seats) . . . .”  
(67 FR at 45858)

You have asked whether “this comment regarding integrated child seat systems eliminates any responsibility of seat manufacturers [under] EWR as a child restraint system manufacturer for those products.” The answer is no. This comment relates to the reporting responsibilities of manufacturers of light vehicles. The proposed rule would have had these manufacturers reporting separately for integrated child restraint systems (Code 08) and for seats (Code 17) (see 66 FR at 66222). In the final rule, as the preamble indicated, reports of light vehicle manufacturers involving integrated child seat systems are to be included as a report for seats (Code 22). As a manufacturer of original equipment, a manufacturer of seats with integrated child seat systems remains subject to the reporting requirements of 49 CFR 579.27, which oblige it to report to NHTSA any claims or notices involving death that relate to its product.

Your second question was “for purposes of EWR, does that comment clarify that integrated child seat systems are to be considered as ‘seats’ and not child restraint systems.” The answer is yes.

If you have further questions, you may phone Taylor Vinson at 202-366-5263.

Sincerely,

  
Jacqueline Glassman  
Chief Counsel