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PRELIMINARY REPORT ON THE DEVELOPMENT OF A GLOBAL TECHNICAL
REGULATION ON HEAD RESTRAINTS

Transmitted by the representative of the United States of America

Note: This document contains a preliminary report on the development of a global technical regulation (gtr) on head restraints. It is based on informal document No. WP.29-136-18 (TRANS/WP.29/1041, para. 90).

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1. INTRODUCTION

During the one-hundred-and-twenty-sixth session of WP.29 of March 2002, the Executive Committee of the 1998 Global Agreement (1998 Agreement) adopted a Programme of Work, which includes the development of a global technical regulation (gtr) to address neck injuries in crashes. The United States of America volunteered to lead the group's efforts and develop a document detailing the recommended requirements for the gtr. The United States of America presented an informal document (WP.29-134-12) in November 2004 proposing the work and highlighting the relevant issues to be addressed in the gtr. This proposal was adopted at the March 2005 session of WP.29 (TRANS/WP.29/AC.3/13).

At the November 2004 WP.29 session, the Executive Committee charged the Working Party on Passive Safety (GRSP) to form an informal working group (working group) to discuss and evaluate relevant issues concerning requirements for head restraints to make recommendations regarding a potential gtr.

Under the guidelines governing the development of a gtr, the working group is to first evaluate the merits of the proposal. This evaluation should include:

1. An examination of the merits of the proposal in detail, outlining the pros and cons of the proposal;
2. Consideration of other regulations on the same subject, which are listed in the compendium;
3. A determination that the proposal addresses a problem of sufficient magnitude to warrant the development of a regulation;
4. An examination of whether the nature, extent and cause of the problem addressed by the proposal are correctly characterized;
5. An examination of whether the proposal provides a sufficiently effective, performance oriented approach to address the problem;
6. A determination that the approach identified in the proposal is appropriate to address the problem; and
7. A description of needed additional information.

The working group met to discuss the development of a gtr on head restraints on 1-2 February 2005 and on 11-13 April 2005 in Paris, France. The next two meetings will be held on 13-15 June 2005 in Washington, D.C., USA and 7-9 September 2005 in Cologne, Germany. A proposed schedule of efforts is outlined in Section 2 of this document.

The Contracting Parties represented on the working group are the Netherlands, France, Canada, Japan, Germany, United Kingdom, United States of America, and the European Commission. Representatives from European Association of Automotive Suppliers (CLEPA) and International Organization of Motor Vehicle Manufacturers (OICA) are also participants.

This report summarizes the main issues discussed by the working party in evaluating the proposal to develop a draft global regulation on head restraints.

2. REQUEST TO PROCEED WITH THE DRAFTING OF A GTR

The United States of America recently upgraded its head restraint standard to provide more stringent requirements. In 1982, the United States of America assessed the performance of head restraints installed pursuant to the current standard and reported that integral head restraints are 17 per cent effective at reducing neck injuries in rear impacts and adjustable head restraints are only 10 per cent effective. The UNECE Regulations on head restraints were considerably more stringent than the old United States of America regulation, and were used as a baseline in developing the new upgraded United States of America head restraint regulation.

Due to the United States of America regulatory upgrade effort, this is an excellent opportunity for the international community to develop and establish a gtr in this area. It is the belief of the working group that everyone could benefit from harmonization and new technology based improvements of head restraints. The benefits to the Governments would be the improved safety of the head restraints, leveraging of resources, and the harmonization of requirements. Manufacturers would benefit from reduction of the cost of development, testing, and fabrication process of new models. Finally, the consumers would benefit by having a choice of vehicles built to higher, globally recognized standards, providing a better level of safety at a lower price.

The proposed gtr will combine elements from UNECE Regulations Nos.17, 25, and newly upgraded United States of America Federal Motor Vehicle Safety Standard (FMVSS) No. 202. While not all issues that would be addressed by a gtr have been resolved, no issues are sufficiently problematic to prevent the development of a draft regulation. It is proposed that a draft gtr could be prepared for discussion at the next GRSP meeting pursuant to the following schedule:

Tasks	Dates
1st Progress Report to GRSP	May 2005
1st Progress Report to AC.3	June 2005
3rd Working Group Meeting	June 2005
Development of draft gtr begins	June 2005
4th Working Group Meeting	September 2005
5th Working Group Meeting	December 2005
2nd Progress Report/Draft gtr to GRSP	December 2005
6th Working Group Meeting	January 2006
2nd Progress Report to AC.3	March 2006
3rd Progress Report/Adoption of Final Draft gtr by GRSP	May 2006
3rd Progress Report to AC.3	June 2006
Submittal of Final Draft gtr to AC.3	November 2006

3. EVALUATION OF THE SAFETY PROBLEM

In the United States of America, between 1988 and 1996, 805,581 whiplash injuries (non-contact Abbreviated Injury Scale (AIS 1) neck) occurred annually in all crashes of passenger cars and LTVs (light trucks, multipurpose passenger vehicles and vans). 272,464 of these whiplash injuries occurred as a result of rear impacts. For rear impact crashes, the average cost of whiplash injuries in 2002 is \$9,994 (which includes \$6,843 in economic costs and \$3,151 in quality of life impacts, but not property damage), resulting in a total annual cost of approximately \$2.7 billion. Although the front outboard seat occupants sustain most of these injuries, whiplash is an issue for rear seat passengers as well. During the same time frame, an estimated 5,440 whiplash injuries were reported annually for occupants of rear outboard seating positions.

A more detailed discussion of the safety problem in the United States of America and their new requirements in the upgraded FMVSS No. 202 can be reviewed in Informal Document HR-1-8.

4. REVIEW OF EXISTING INTERNATIONAL REGULATIONS

The following existing regulations, directives, and standards pertain to head restraints:

- UNECE Regulation No. 17 - Uniform Provisions concerning the Approval of Vehicles with regard to the Seats, their Anchorages, and any Head Restraints
- UNECE Regulation No. 25 - Uniform Provisions Concerning the Approval of Head Restraints (Head Rests), whether or not Incorporated in Vehicle Seats
- EU Directive 74/408, concerning interior fittings of motor vehicles
- EU Directive 96/037, adapting to technical progress Council Directive 74/408/EEC relating to the interior fittings of motor vehicles (strength of seats and of their anchorages)
- EU Directive 78/932/EEC, concerning head restraints of seats of motor vehicles
- United States of America Code of Federal Regulations (CFR) Title 49: Transportation; Part 571.202: Head Restraints
- Australian Design Rule No. 3/00, Seats and Seat Anchorages
- Australian Design Rule No. 22/00, Head Restraints
- Japan Safety Regulation for Road Vehicles Article No. 22 – Seat
- Japan Safety Regulation for Road Vehicles Article No. 22-4 – Head Restraints, etc.
- Canada Motor Vehicle Safety Regulation No. 202 – Head Restraints
- International Voluntary Standards --SAE J211/1 revised March 1995 – Instrumentation for Impact Test – Part 1 – Electronic

Additionally, research and activities being conducted by European Enhanced Vehicle-Safety Committee (EEVC) Working Group 12, EEVC Working Group 20, and EuroNCAP are also being considered.

5. DISCUSSION OF ISSUES TO BE ADDRESSED BY A GTR

The following discussions reflect the working group's identification of specific issues, as well as the group's evaluation of those issues. A draft comparison of the requirements of UNECE Regulation No. 17 and US FMVSS No. 202 is provided in the Appendix of this document.

5.1. Applicability

The application of a head restraint gtr will, to the extent possible, use the revised vehicle classification and definitions of Special Resolution No. 1 (S.R.1).

There has been limited discussion of the applicability of this gtr. The application of US FMVSS No. 202 is different than UNECE Regulation No. 17. FMVSS No. 202 requires head restraints in all front outboard seating positions and regulates head restraints optionally installed in the rear outboard seating positions for vehicles up to 4,536 kg. UNECE Regulation No. 17 requires head restraints in all front outboard seating positions of vehicles of category M1, vehicles of category M2 up to 3500 kg and vehicles of category N1 and regulates head restraints optionally installed in all seating positions, in all vehicles. There is consensus to recommend that the gtr should recommend head restraints in all front outboard seating positions for Category 1-1 vehicles. Vehicles of category 1-2 and 2 need more discussion especially on the weight limit. It was proposed that the gtr, as it pertains to front outboard seats, should apply to vehicles up to 4,536 kg and justification for this will be provided at the June 2005 working group meeting. This discussion will continue at the upcoming meetings and is dependent on the requirements of the gtr.

5.2. Scope

In the working group meetings, it was proposed that the scope of the gtr should specify requirements for head restraints to reduce the frequency and severity of neck injury in low speed rear-end and other collisions. The delegates and representatives were requested to review the proposal for the planned June 2005 meeting.

5.3. Height of the Head Restraint

5.3.1. Front Outboard

Both UNECE Regulation No. 17 and the FMVSS No. 202 Final Rule require front outboard head restraints with a minimum height of 800 mm above the R-point/H-point, respectively. A proposal was made to recommend a minimum height of 850 mm, to accommodate the taller citizens of some countries. Data was provided showing that the average sitting height for adults in Netherlands and the United States of America have increased over the last 10 years and a higher head restraint is needed to protect these occupants. There is some resistance to requiring a minimum height of 850 mm rather than 800 mm for the front head restraints, citing concerns with roof interference, evacuation in case of emergency, and visibility. In addition, there were concerns expressed over measuring active head restraint systems using the same methods to measure passive systems. The item is still under discussion.

5.3.2. Rear Outboard

There was general consensus to recommend that optionally installed rear outboard head restraints be required to meet a minimum set of requirements. If a vehicle has rear outboard head restraints, it is recommended that they meet the requirements and have a minimum height of 750 mm. One proposal was made to define a rear head restraint as any seat structure 700 mm above the H-point. Current practice in UNECE is allowing the manufacturer designating what is and is not a head restraint. Further discussion is needed to clarify this requirement. Additionally, the application of this requirement to all vehicles is still under discussion.

5.3.3 Front Center/Rear Center

It has been proposed to include in the gtr the UNECE Regulation No. 17 requirement to regulate optionally installed head restraints in all seating positions, including front and rear center seats. Concerns about rearward visibility were expressed. This item is still under discussion.

5.3.4. Clearance Exemption

There is consensus to recommend, in the measurement of height, the allowance of a 25 mm clearance exemption for the "roofline or backlight." Further definition of "backlight" (i.e., "rear window") and inclusion of padding in the roofline is still needed. In addition to the clearance exemption, it was also suggested to incorporate the UNECE Regulation No. 17 requirement for a minimum height of the rear seat. It was also requested that the working group consider convertible roofs as they are retracted.

5.4. Adjustable Front Head Restraints – Front Surface Height

It has been proposed to include in the gtr the UNECE Regulation No. 17 requirement that the height of the head restraint face be a minimum of 100 mm to ensure sufficient surface for the occupant's head to contact. The UNECE Regulation No. 17 requirement is measured in the same manner as the overall height of the head restraint. There have been concerns expressed that the measurement taken in this manner does not address the effective height of the restraint. In the case of extremely contoured head restraints, the height of the surface that the head would contact is less than the measured height. It has been proposed that the 100 mm requirement be applied to this effective height of the head restraint. This proposal was countered by some as not necessary because the shape of the head restraint is governed by the displacement test, energy absorption test, and other requirements. This issue is still under discussion.

5.5. Head Restraint Width

5.5.1. Front Seats

5.5.1.1. Single Seats

There is consensus to recommend that single front outboard seats have a minimum head restraint width of 170 mm.

5.5.1.2. Bench Seats

There is a proposal to recommend that head restraints have a minimum width of 254 mm when installed in the front outboard positions on bench seats. Justification for this requirement has been requested. There are also concerns about rearward visibility with these wider restraints and the definition of "bench seats".

5.5.2. Rear Seats

There was consensus to recommend that rear outboard seats, if installed, have a minimum head restraint width of 170 mm.

5.6. Seat Set Up and Measuring Procedure for Height

There are two proposals under discussions concerning the set-up of the seat for measurement and the measurement procedure. One proposal is to use the manufacturers recommended seating position as detailed in UNECE Regulation No. 17. The other is to use the procedure that is outlined in the recently adopted FMVSS No. 202, which positions the seat in the highest position of adjustment and sets the seat back angle at a fixed 25 degrees. The United States of America procedure allows for results of height and backset to be compared from vehicle to vehicle. The UNECE Regulation No. 17 procedure allows the seat to be measured at the same seat back angle that is used to determine other occupant design requirements, such as sight angles and has proved to be very repeatable and reproducible; concerns have indeed been raised that the United States of America procedure would result in high variations at certification. UNECE Regulation No. 17 also takes into account the difference in seating positions for different vehicle types.

In addition to the set-up of the seat, the method of measuring height is under discussion. Some recommend taking all measurements from the R-point. Another proposal is to use the J826 manikin as the primary measurement tool. The use of the R-point allows measurements to be verified to known design points on the vehicle thus improving repeatability. The use of the J826 manikin allows the seat H-point to be measured as it exists in the vehicle and when it is under load. It was argued that options in seat materials and manikin set up can produce recordable differences from one seat to another. UNECE experience shows that the use of the R-point allows measurements to be easily verified on a drawing and is also very repeatable and reproducible when verified in a car. The use of H-point can address differences in measurements caused by seat materials.

5.7. Backset

It was proposed to recommend a maximum backset of 55 mm for front outboard head restraints, using the Head Restraint Measuring Device (HRMD), as a measuring tool. There is general consensus to recommend the regulation of backset, but there was concern that the 55 mm requirement is too

stringent. Data has been presented with regard to concerns relating to repeatability/reproducibility issues with the test device and with using different technicians to measure the backset. There has also been concern for the comfort of the occupant and measuring active head restraint systems using the same methods to measure passive systems.

5.8. Gaps

5.8.1. Gaps within Head Restraint

It has been proposed that all gaps within the head restraint have a maximum height of 60 mm when measured using a 165 mm sphere. In addition to this requirement, it has also been proposed to allow gaps larger than 60 mm if the displacement tests requirements can be met when the load is applied at the gap. There is general consensus to recommend the sphere measurement requirement. The proposal to use the displacement test to test the gaps is still under discussion.

5.8.2. Gaps between bottom of head restraint and top of seat back

It has been proposed that gaps between the bottom of the head restraint and the top of the seat back have maximum height of 60 mm when measured using a 165 mm sphere. There has been an alternative proposal to allow a maximum height of 25 mm when measured using the same method to measure overall height as described in UNECE Regulation No. 17. It was noted that because of seat contours, there was concern that using the sphere to measure this gap could result in failure of gaps that would normally pass the UNECE Regulation No. 17 requirement or gaps that are extremely small. This issue is still being discussed.

5.9. Head Restraint Adjustment Retention Devices (Locks)

There is general consensus to recommend that if a device is adjustable for height, then it should lock in the downward direction. It has been proposed that downward force of 500 N be applied to the top of an adjustable head restraint to ensure the integrity of the lock. Concern was expressed that this load was overly severe, the forces were being applied in the wrong direction, and that such a requirement might negatively affect active head restraint system design. Data from Hybrid III dummies was provided on the representativeness of the force levels. It was also questioned if the measurement taken at the top of the head restraint is the correct method as it does not take into account the foam hysteresis. As alternative it has been suggested to use the bottom of the head restraint as reference.

5.10. Removability

There is general consensus to recommend the ability for head restraint removal via a deliberate action distinct from any act necessary for adjustment as stated in UNECE Regulation No. 17. There is discussion on the meaning of "a deliberate action distinct from any act necessary for adjustment". It has been proposed to allow for removal via a deliberate action distinct from any act necessary for upward adjustment. This issue is still under discussion.

5.11. Non-use Positions

5.11.1. Front Seats

It has been proposed to allow non-use positions in the front seat, as long as they automatically return to the proper position when the seat is occupied. A test procedure using the 5th percentile female Hybrid III dummy to evaluate these systems is being reviewed.

5.11.2. Rear Seats

5.11.2.1. Manually adjusted non-use positions

There is consensus to recommend regulation of non-use positions in the rear seats, as long as the position is "clearly recognizable to the occupant". There is discussion on how to objectively evaluate this requirement. One proposal is to define "clearly recognizable" as a head restraint that rotates a minimum of 60 degrees forward or aft. There was concern that this definition is too design restrictive. The working group is discussing the expansion of this definition to allow for other types of stowable head restraints system designs.

5.11.2.1. Automatically adjusted non-use positions

There is consensus, for the rear seats, to recommend regulation of non-use positions that automatically return to the proper position when the seat is occupied. A test procedure using the 5th percentile female Hybrid III dummy to evaluate these systems is being reviewed.

5.12. Energy Absorption

It has been proposed to recommend the energy absorption test defined in FMVSS No. 202. This test is similar to the test defined in UNECE Regulation No. 17, except for the testing device and the requirement to rigidly fix the seat back during testing. Testing is being conducted to show that the test devices in the two regulations are functionally equivalent. Discussions on the test set-up are still ongoing.

5.12.1. Radius of Curvature

It has been proposed to incorporate the UNECE Regulation No. 17 requirement that after undergoing the energy absorption test, designated parts of the front and the rear of the head restraint shall not exhibit areas with a radius of curvature less than 5 mm. This requirement was not included in FMVSS No. 202. Discussion on whether to apply this requirement to the rear of head restraints is dependant on the outcome of the discussion on the Scope of the gtr. Discussion of this issue is ongoing.

5.13. Displacement Test Procedures/Adjustable Backset Locking Test

A proposal was made to incorporate into the gtr the displacement test defined in FMVSS No. 202. This test adapted the displacement test procedure in UNECE Regulation No. 17 to incorporate an objective evaluation of adjustable backset locking systems. This proposal is being evaluated.

5.14. Dynamic Test

A proposal was made to recommend incorporation of the optional dynamic test defined in FMVSS No. 202 into the gtr as an option to the static requirements. Data was presented positively correlating the dynamic test to real-world data. There was a great deal of concern expressed by some delegates and representatives with respect to using the Hybrid III dummy in a dynamic test because the spine is not human like and the dummy does not have humanlike motion in a dynamic test. A more detailed discussion of this problem can be reviewed in Informal Document HR-2-9. It was stated that the BioRID dummy is preferred in Europe for dynamic testing, but it was acknowledged that it was not ready for regulation. There was some discussion that the dynamic test be a second step to the gtr drafting process. A solution on how to include testing of active head restraints in the gtr remains to be found.

Appendix

Comparison of Head Restraint Regulations UNECE Regulation No. 17/FMVSS No. 202
(Current US standard, US Final Rule, and UNECE Regulation No. 17)

Head Restraint Component	U.S. – FMVSS No. 202 (current)	US FMVSS No. 202 Final Rule	UNECE Regulation No. 17	Comments
A. Application 1. Vehicles				
	Front outboard seating positions in passenger cars, MPVs and trucks with a GVWR ≤ 4536 kg	Front outboard and rear outboard (optional) seating positions in passenger cars, MPVs and trucks with a GVWR ≤ 4536 kg, with added exclusion for seating position adjacent to aisle on buses (more than 10 seats)	Front outboard and rear (optional) seating positions in vehicles of categories M1 and N, and of vehicles of categories M2 and M3, not covered by Regulation No. 80	-If HR present in rear seat, UNECE Regulation No. 17 and 202 Final Rule regulates. -UNECE Regulation No. 17 regulates rear center head restraints if available.
2. Requirements				
a. Height				
1. Front outboard				
A. Fixed	At least 700 mm above H-point as measured parallel to the torso reference line.	Increased to 800 mm above H-point and measured with a SAE J826 manikin. Seat back angle set at 25 degrees. Seat cushion at highest position.	Same height as FR, but measured from R-point. Seat back angle is 25 degrees or manufacturer specified. Seat cushion at lowest position	Different seat set-up and measuring techniques used.

Head Restraint Component	U.S. – FMVSS No. 202 (current)	US FMVSS No. 202 Final Rule	UNECE Regulation No. 17	Comments
B. Adjustable	Same as 202-fixed	Must achieve a height of 800 mm and cannot be adjusted below 750 mm. Measured with a SAE J826 manikin. Seat back angle set at 25 degrees. Seat cushion in highest position.	Same height as FR, but measured from R-point and at manufacturer’s suggested angle or 25 degrees. Seat cushion in highest position.	Different seat set-up and measuring techniques used.
a. Height (cont.) 2. Rear outboard (No. 202 Final Rule: <u>Rear head restraint</u> means a rear seat back, or any independently adjustable seat component attached to or adjacent to a seat back, that has a height equal or greater than 700 mm, in any position of backset and height adjustment.)				
A. Fixed	Not specified	If provided, minimum height of 750 mm above H-point. Measured with SAE J826 Manikin.	If provided, same height as FR, but measured from R-Point	Different seat set-up and measuring techniques used.
B. Adjustable	Not specified	If provided, no adjustment below 750 mm from H-point. Measured with SAE J826 Manikin.	If provided, same as FR, but measured from R-Point	Different seat set-up and measuring techniques used.
3. Rear Center				
	Not specified	Not specified	If provided, minimum height of 700 mm above R-point	

Head Restraint Component	U.S. – FMVSS No. 202 (current)	US FMVSS No. 202 Final Rule	UNECE Regulation No. 17	Comments
b. Backset				
1. Front outboard positions	Not specified	Backset limited to a maximum 55 mm as measured with HRMD. Head restraint in at any height adjustment between 750 and 800 mm, inclusive. Seat back angle set at 25 degrees. Seat cushion at highest position.	No backset specified, but there is a general requirement for the seat back angle to be set at manufacturer’s suggested angle or 25 degrees and the seat cushion to be in the lowest position.	Different seat set-up and measuring techniques used.
c. Width				
1. Front outboard	Minimum of 171 mm on single seats and 254 mm on bench seats	Minimum of 170 mm on single seats (outboard seats with no seat in between) and 254 mm on bench seats (outboard seats with seat in between).	Minimum of 170 mm for all seat types.	United States of America requires wider HRs on front outboard seats with a center seat between them.
2. Rear outboard	Not specified	If provided, minimum of 170 mm for all seat types	If provided, minimum of 170 mm.	
d. Height of adjustable head restraint front surface				
	Not specified	Not specified	Minimum height of 100 mm	

Head Restraint Component	U.S. – FMVSS No. 202 (current)	US FMVSS No. 202 Final Rule	UNECE Regulation No. 17	Comments
e. Gaps				
1. All outboard positions	Not specified	In all positions, gap between HR and seat back and within the HR is ≤ 60 mm. A 165 mm sphere is pressed against the gap with a load no more than 5 N	<p>-In lowest position, gap is ≤ 25, with no reference to backset adjustment. Measured along straight line between HR and seat back.</p> <p>-In other positions the gap ≤ 60 mm as measured with 165 mm dia. sphere.</p> <p>-Gaps larger than 60 mm are allowed if they pass the energy absorption test.</p>	<p>-UNECE Regulation Nos. 17 and 25 does not specify load placed on the sphere to measure gap.</p> <p>-UNECE Regulation Nos. 17 and 25 measures the gap between the HR in the lowest position and seat back differently from the gaps in the HR.</p> <p>-Larger gaps allowed by UNECE, but must be tested.</p>
f. HR Adjustment Retention Devices (locks)				
1. Height	Not specified	Must maintain height in highest position and at 800 mm and 750 mm for front and rear seats (if HR provided), respectively, while a downward force is applied. Seat back is rigidly constrained.	If adjustable, requires automatic locking system (UNECE Regulation No. 17, 5.1.1). No downward test required.	UNECE Regulation has no downward testing requirement.
2. Backset	Not specified	Under applied rearward moment, while adjusted to 800mm for front and 750mm for rear (if provided), HR must maintain any position of backset adjustment. Seat back is rigidly constrained.	Not specified.	

Head Restraint Component	U.S. – FMVSS No. 202 (current)	US FMVSS No. 202 Final Rule	UNECE Regulation No. 17	Comments
g. Removability				
1. Front	Not specified	Can be removed with deliberate action distinct from any act necessary for adjustment.	Same as 202 FR	
2. Rear	Not specified	Can be removed with deliberate action distinct from any act necessary for adjustment.	Same as 202 FR	
h. Clearance				
	Not specified	25 mm clear space allowed where rear HRs, when seat is occupied, interfere with roofline or rear window.	If HR provided, 25 mm clear space allowed where interference with vehicle structure. Seat does not need to be occupied. Minimum height of 700mm must be maintained.	-In UNECE the 25 mm gap is measured from any vehicle structure, not just roofline or rear window as in FR. -UNECE requires a minimum seat height if HR is present. FR defines a rear HR as having a height greater than 700 mm

Head Restraint Component	U.S. – FMVSS No. 202 (current)	US FMVSS No. 202 Final Rule	UNECE Regulation No. 17	Comments
i. Non-use positions				
1. Front	Not specified	Not allowed	Allowed, provided HR automatically returns to proper position when seat is occupied.	
2. Rear	Not specified	Allowed, provided HR automatically returns to proper position when seat is occupied or the HR is rotated a minimum of 60° forward or rearward.	Allowed as long as non-use position is "clearly recognizable to the occupant".	US rule defines "clearly recognizable" as being rotated forward or rearward 60°.
j. Radius of Curvature				
	Not specified	In NPRM, requirement was same as UNECE Regulation No. 17. Requirement was deleted in final rule.	Parts of front and rear of HR shall not exhibit a radius of curvature less than 5 mm.	Deleted in FR because enforcement outweighs benefits. No commenter had info to support reg.
k. Energy Absorption				
	Not specified	Front of HR impacted with head form at v=24.1 km/h. 3ms deceleration of head form must not exceed 80gs . Impactor is linear head form with mass of 6.8 kg.	Similar to FR: Uses pendulum impactor with same weight and velocity as linear impactor. Front and rear of HR tested.	Tests in UNECE and FR are functionally equivalent. Except FR does not test rear of HR.

Head Restraint Component	U.S. – FMVSS No. 202 (current)	US FMVSS 202 Final Rule	UNECE Regulation No. 17	Comments
l. Displacement Test Procedures				
	Load is applied to back pan of seat, load is applied to head restraint after seat load is removed. 102 mm of displacement allowed with 373 Nm moment. Load is increased until 890N or seat back fails. Use spherical or cylindrical form to apply load.	Test procedure modified from 202. Seat back and HR loaded together. Moments and displacements same. Maximum load the same, seat back cannot fail. Use spherical form to apply load	Same load and displacement requirements as FR.	FR provides a detailed test procedure, including load hold times.
m. Dynamic sled test (optional)				
	Seat accelerated so the pulse falls in a corridor defined by 2-½ sine waves with amplitudes of 78 m/s ² and 86 m/s ² . Corridor cannot be met. 95th male dummy used, max rotation 45°.	New corridor based on scaled version 208 sled test. Target pulse the same as 202. 50th male dummy used in any seat, HR adjusted midway between lowest and highest position and any backset position. 12° max rotation.	Not specified	
