

Comments from the United States on ECE/TRANS/WP.29/GRSP/2013/17

1. The cited document proposes changes to paragraph 5.1.1.2 of GTR No. 7 on Head Restraints. Specifically, the proposal would require front outboard designated seating positions to have at least one position of head restraint adjustment that was not less than 830 mm, an increase of 30 mm over the current requirement of 800 mm. In addition, the proposal would require the same seating positions to have at least one position of head restraint adjustment that was not less than 720 mm, a decrease of 30 mm over the current requirement of 750 mm.
2. We note that while the proposed change to the regulatory text summarized above applies to front outboard designated seating positions, the justification discusses a decrease in the height requirements for head restraints in the rear; therefore we will discuss both concepts in our comments.
3. To justify the increase in height requirement, the document cites a 2007 European Enhanced Vehicle Committee study “UK Cost-benefit Analysis: Enhanced Geometric Requirements for Vehicles Head Restraints.” As noted in paragraph 50 and footnote 18 to Part A of the GTR, this study was made available to the informal group approximately one month prior to the session of GRSP in which the GTR was finalized, and therefore had not been fully accepted by all Contracting Parties at that time. However, multiple concerns were raised at that time to the proposal to raise the head restraint height to 850 mm based upon the findings of this report (see paragraphs 51 and 52 to Part A of the GTR).

4. Concerns raised regarding an 850 mm height requirement were:
 - (a) Difficulties in installing seats with higher head restraints in some vehicles;
 - (b) Restrictions to occupant visibility to the rear and side; and,
 - (c) Concerns that the measurement method may not reflect the effective height of the head restraint.

Of these three concerns, only the second is acknowledged or responded to by the current proposal.

5. With regard to the visibility concerns, while the documents acknowledges them, it does not provide any scientific data to support the proposal to reduce head restraint height by 30 mm to address these concerns, regardless of whether the proposal is intended for front outboard or other seating positions. How was it determined that 30 mm is sufficient to mitigate the visibility issues? How does the reduction in height of the lowest adjustment position affect the safety of the head restraint for occupants of that seating position?
6. There is also no explanation in this document of why a study that was previously cited to support a head restrain height of 850 mm is now being used to support a proposal of 830 mm.
7. Until these questions and the other concerns previously raised have been addressed by an evidence-based proposal that addresses both the benefits and disbenefits, the United States cannot support changes to the head restraint height requirements in the GTR.
