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TK Holdings Inc.
2500 Takata Drive
Auburn Hills, Michigan 48326-2636
Switchboard: (248) 373-8040
Fax: (248) 373-2897

June 23, 2000

Ms. Rosalyn G. Milman
Deputy Administrator
National Highway Traffic Safety Administration
400 Seventh Street, SW
Room 5220
Washington, DC 20590

Subject: Petition for Reconsideration to Final Rule – FMVSS 208
Docket Number NHTSA 00-7013; Notice 1

Dear Deputy Administrator Milman: 18

Takata compliments the NHTSA for its efforts in issuing the Final Rule for FMVSS 208. We view this ruling as a major milestone in the advancement of automotive occupant safety. However, we respectfully submit the following issues for reconsideration.

1. **Section S4.11(a), Test duration for purpose of measuring injury criteria.**

We agree with the requirement that specifies the time period for recording data for 300 milliseconds after the deployment signal for the low risk option tests. However, the section should clarify that the injury criteria should be calculated based on the data that is not affected by interactions between the test dummy and the vehicle interior. NHTSA's own stated belief is that the airbag is not responsible for the injury values, which may result from such interactions. Specifically we suggest that the injury values be calculated based on the data truncated to the starting point of any such interactions, or 300 milliseconds, whichever comes first. Otherwise, test results may wrongly be interpreted to attribute injury consequences to airbag performance.

When considering compliance tests, variations in results should be minimized to the extent possible. As this section is intended to evaluate the performance of the airbag itself, it should not include factors that may yield excessive variations in test results.

2. **Sections S22.4.2.4 and S24.4.2.4, Position 1 procedure for low risk deployment.**

These sections contain no requirements for seat position, such as track location, height, or back angle. We believe there should be a specification for seat location in the test procedure. Lack of a specification for particular seat location may yield excessive variations in results, depending on the way in which the tests are set up. We believe the seat specifications should require that the seat be as far rearward as possible and that the seat back angle be set to the manufacturer's design position.

If any aids to positioning the dummy are permitted, e.g., spacer blocks, specifications should be provided to avoid the likelihood of test variations.

3. **Section S16.3.3.3.1, Passenger foot positioning.**

The procedure states that the feet are to be placed on the floor and as far forward as possible. Is it permissible to place the feet, or portions thereof, on the toeboard in order to get them as far forward as possible, or must the feet be always flat and parallel to the essentially horizontal floor? This question is posed because we are not certain if reference to the floor is intended to include the toeboard.

4. **Sections 20.2.1.4, 20.2.1.5, 20.2.3.2(a), 20.4.7, and 22.2.1.6.1 Belt tension for tests using CRS's.**

The procedure for placing and restraining a CRS on the vehicle seat may cause the CRS to be unstable laterally or longitudinally. That can happen as a result of applying and measuring belt tension on one side of the CRS only. An unstable position is neither reasonable nor desirable. We suggest that the following wording be added to the end of this section to avoid this condition:

> Before measuring the belt tension, the child restraint (or car bed) shall be moved laterally and longitudinally, sufficient to allow the CRS to find its natural and stable position.

Thank you for your consideration of these issues.

Sincerely,

Al Bernat
Group Vice President - Engineering
TK Holdings Inc.

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