



September 18, 2023

House Transportation, Mobility, and Infrastructure Committee
Representative Nate Shannon, Chair
Michigan House of Representatives
124 North Capitol Avenue
Lansing, MI 48933

Re: Support for HB 4511 and HB 4512

Dear Chair Shannon and members of the House Transportation, Mobility, and Infrastructure Committee,

The Juvenile Products Manufacturers Association (JPMA) is a national not-for-profit trade organization representing 95% of the prenatal to preschool industry including the producers, importers, or distributors of a broad range of childcare articles that provide protection to infants and assistance to their caregivers. These products are sold globally and nationally, and consistency of safety regulations is a critical aspect of product development. Promoting baby safety is a key mission of the Association. We are the originator of Baby Safety Month, which occurs in September of each year and we are working year-round to ensure that caregivers are informed and children's safety is protected.

The current child passenger safety policy statement from the American Academy of Pediatrics (August 2018) recommends delaying transition as long as possible for each mode of restraint, based on the specific weight, height and age limits in the manufacturer instructions for the specific car seat model. The National Highway Traffic Safety Administration (NHTSA) guidance agrees with the AAP, and both groups recommend rear seat placement for children until they are at least age 13.

The JPMA generally supports legislation requiring extended rear-facing car seat use. With age 2 as a chosen requirement for rear-facing child restraint use, we must also consider that these safety devices are designed and tested to protect children within their specified height and weight ranges when used correctly. For that reason, we strongly recommend that the language expressly state that the child restraint manufacturer instructions for height, weight, age and usage must be followed. Such a requirement should be applied to all restraint systems in all modes of use for consistency with the above recommendations and to avoid confusing affected motorists.

HB 4511 meets these criteria and we are pleased to support this effort. Since the included revisions are quite prescriptive, which could cause some confusion on the meaning of "properly secure," we suggest that you consider an additional modification: "Except as provided in this section, or as otherwise provided by law, a rule promulgated under the administrative procedures act of 1969, 1969 PA 306, MCL 24.201 to 24.328, or federal regulation, each driver transporting a child in a motor vehicle shall properly secure that child in a child restraint system that meets the standards prescribed in 49 CFR 571.213 *according to manufacturer instructions.*"

We're also happy to support HB 4512 which adds education from a certified child passenger safety technician (CPST) to the waiver requirements for an infraction of section 710d, if the person also supplies evidence of

JUVENILE PRODUCTS MANUFACTURERS ASSOCIATION, INC.

1120 Route 73, Suite 200 • Mt. Laurel, NJ 08054

TEL: 856.638.0420 • FAX: 856.439.0525

jpma@jpma.org • www.jpma.org

acquisition of a child safety seating system that meets requirements. CPSTs are highly trained and are an excellent way for parents and caregivers to learn hands-on how to use car seats and ensure their correct installation.

On behalf of the juvenile products industry and child restraint manufacturers, we want to thank you for your efforts to keep Michigan children safe from harm. Motor vehicle crashes are a leading cause of death and injuries, and car seat education, legislation, and enforcement are proven methods for reducing their negative effects.

Respectfully Submitted,

A handwritten signature in brown ink, appearing to read "Joe Colella", is positioned above a small yellow rectangular mark.

Joe Colella
Director of Child Passenger Safety
Juvenile Products Manufacturers Association

