

# SafetyBeltSafe News

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## LATCH: The Saga Continues

### ■ Regulatory Proposals Pro and Con

When LATCH was first created, the intent was to make installing safety seats simpler by providing a consistent, purpose-designed system, namely bars onto which safety seats might be snapped. Yet the road has proved rocky. First, the system changed from a rigid plug-in to a hook on flexible webbing, which like safety belts, needed to be tightened. Then, for most vehicles, the location of LATCH is outboard, not in the center, usually considered safest. Although a few manufacturers permit parents to “borrow” the inboard LATCH bars from both side locations to LATCH in the center, most do not.

In the 3/12 issue of *SBS News*, the newest proposed child passenger safety (CPS) rule from National Highway Traffic Safety Administration (NHTSA) was described. At [www.regulations.gov](http://www.regulations.gov), NHTSA-2011-0176, establishing the 10-year-old test dummy and its use in two years, contains two regulatory keys to LATCH use questioned by safety seat manufacturer Diono and advocates, including SBS USA and Safe Ride News Publications (SRN).

Most striking is that by restricting the use of LATCH to a *total* weight of 65 lbs., the top weight of children, riding in heavier safety seats, to use lower anchors might well be *less* than the *original* designated top child weight of 48 lbs. However, now the top child weight certified for conventionally marketed seats with harness systems has risen to 90 lbs! The idea of specifying a top child weight for each specific seat might work so long as the top *child* weight for use of lower anchors was about 65 lbs.

Diono comments that parents may begin worrying about the effect of winter clothing on the viability of

the lower anchors and either use the safety belt instead long before it is necessary or even more discouraging, move to a belt-positioning booster.

The SRN/SBS USA comment questions the need to limit lower anchor use to 65 lbs. Once parents use lower anchors with the higher child weight of 48 lbs., they rarely think about changing during the span of a particular safety seat. The new system may make such incorrect use more pervasive. It has not been shown that lower anchor bars are failing, in either the “real world” or in testing. (*See SBS News, 9/10*).

Grateful that NHTSA has not set a top weight for top tether use, advocates fear lower weight limits for tethers might emerge, despite the lack of data on top tether failure. NHTSA has proposed continuing to test higher-weight seats with and without tether attachment. With no simple alternative to tether use, this is critical. However, in earlier NHTSA regulatory language, it was clear that it was expected that children up to 65 lbs., at least, would be covered by use of lower anchors, now being questioned.

Advocates recommend major publicity for the need to use tethers, which, of course, also reduce stress on the lower anchor bars. These are important tools to help parents protect older, taller, and heavier children who need the features of a safety seat with internal harness much longer than is common now. More than a decade ago, the needs of children with physical and/or emotional challenges, transported by both parents and professionals, provoked the SBS USA petition to make it easier for parents to have heavy-duty tethers installed to replace the mandated ones. It appears this needs to be reconsidered.

*Continued on page 4*

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## Calendar

### ■ CONFERENCE

\* **8/16-18:** Kidz in Motion,  
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[www.kidzinmotion.org](http://www.kidzinmotion.org).

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## Recall

Some Dorel rear-facing-only seats, Comfy Carry (IC123FSM) and onBoard 35 (IC124FSM) made 5/1/11 to 4/30/12, were sold, most to institutional customers, without the detachable base that contains the required LATCH hardware. Dorel is sending a base with the attachments to registered owners and those who call 877/416-8111.

- The DVD of Child Restraint Manufacturers' Instructions with Summary Sheets, 2002 - 2011, is now available.
- Boosters Are For Big Kids kit, including 2 curricula for K-3, 4-6 grades, can be taught by volunteers.  
Order form is at [www.carseat.org](http://www.carseat.org).
- Ride Safe From the Start, the online program for first-time expectants: email [stombrello@carseat.org](mailto:stombrello@carseat.org) for details.

## Published!

SBS USA member Martha Waggoner and colleague Kathryn Haller were dismayed to see a 2011 cover of *Nursing for Women's Health* with a preemie buckled up improperly, illustrating a story on tools for discharging newborns.

In the current issue, the pair dissected the errors, using SBS USA as a reference, while sharing correct choices that should have been made.

Seizing the "teaching moment," the two nurses gave clear tips on errors -- from seat choice and wrapping before strapping to not using a device which actually was pushing the tiny newborn's chin into the chest area -- but also included alternatives to make baby and caregiver much happier.

## Seat Fit Program

The May 2011 issue of *SBS News* summarized issues related to the proposed voluntary fit program for auto manufacturers to identify 9 seats that worked well in each vehicle model; NHTSA would post these lists on [safercar.gov](http://safercar.gov).

A joint response to the proposal from Safe Ride News Publications, SBS USA, Joe Collela of Traffic Safety Programs, and pediatricians Alisa Baer, Ben Hoffman, and Laura Janna, was submitted in 4/12.

Drawing on the LATCH incompatibility study released in April and long-acknowledged issues, the group identified key points. One is the concern about the effect on smart air bag performance if anything impinges on the front passenger seat mechanism. A leaning rear-facing safety seat or an older child who kicks could become a liability in the rear seat!

Revisiting the proposal, the limitations of the data to be collected were noted. Only current seats and vehicles would be addressed, yet most parents put new seats into older vehicles, as the safety seat marketplace makes dramatic shifts often. If the fit program only required the seats to fit, not fit *easily*, as the recent LATCH study (*see p. 4*) shows, incorrect use will continue in the real world. The need to test the viability of placing 3 safety seats across a rear seat is a key feature not listed in the proposal.

In summary, the group suggested NHTSA interview Nissan staff to see how they managed to maintain their fit program for new vehicles within a reasonable time frame but advised that the focus be shifted to known sources of incompatibility.

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## Boosters Are For Big Kids

It started with 160 words submitted on Leap Day 2012 to secure \$25,000 to develop a model city approach with Boosters Are For Big Kids for Pasadena, California. On April 27, now selected for the Top 100 proposals to "Cause an Effect" with State Farm Insurance funding, *SafetyBeltSafe U.S.A.* began the Facebook campaign to stay in the Top 40 Causes, thus to be eligible for funding.

From April 27 on, SBS USA and our supporters urged friends and relatives to both expand the network of supporters and to visit the voting site EVERY day to register 10 votes per person in support. As the days went on, the competition grew. BAFBK started in the top 15, but others got into the groove, so that at the end, May 17, it was hotly contested. BAFBK voters from as far away as Ethiopia and as close as Pasadena helped us to end the competition in 25<sup>th</sup> place.

Now the next phase of the challenge: maximizing the use of the funds to blanket Pasadena with knowledge of the 5-Step Test. We look forward to partnering with all facets of Pasadena to create an exemplar city and reduce the risk for kids by 45%.

## New Products

■ **Combi Shuttle 35** is a rear-facing-only seat for birth to 35 lbs. with base, up to 22 lbs. without base. It has a removable seat cushion for small infants and an anti-rebound bar. There are two sets of loops on the harness strap ends to change the length, a front adjuster strap, and the shoulder harness moves up and down with the adjustable headrest. The angle is adjusted with a foot on the base (4 positions) and has dual reclines for small and larger babies. The base includes a shoulder belt lock-off and click-on LATCH connectors.

■ **Graco MyRide 70** is a convertible for 5-40 lbs. rear facing, up to 70 lbs. forward facing. It has a body support that lifts smaller infants to improve harness fit. There are 3 sets of loops on the harness strap ends to change the length, a front adjuster strap, 5 sets of harness slots, and one crotch slot.

■ **Graco Size4Me 70** is a convertible for 4-40 lbs. rear facing, up to 70 lbs. forward facing. It has a body support that lifts smaller infants to improve harness fit. The harness moves up and down with the adjustable headrest and has a front adjuster strap; there are 2 crotch strap positions. The seat has click-on LATCH connectors.

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**SafetyBeltSafe News**

**May 2012**

## **LATCH: The Saga Continues** *(cont. from pg. 1)*

### **■ The Findings**

Insurance Institute for Highway Safety (IIHS) released a study of LATCH compatibility with auto design in *Status Report*, 4/12/12, done with University of Michigan Transportation Research Institute (UMTRI), which found only 21 of 98 2010-2011 models made LATCHing easy, a dismal result. Since the initial purpose of LATCH was ease-of-use, these results beg for vehicle design responses.

After 12 years of mandate, only 21% had easy-to-use LATCH based on UMTRI evaluation of fit, accessibility, and visibility of LATCH. A dozen vehicles, both easy and tough to fit, were offered to 36 volunteers, all of whom parent young children. Using only instruction manuals, each attempted installations with 3 safety seats. The results validated the features deemed predictive of accurate attachment: depth of lower anchor location; clearance/interference from vehicle seat features and belt buckles; and force required to get a tight attachment. When lower anchors were too recessed or obscured by buckles, plastic rims, or thick seat material, installations were poor or difficult. Visible anchors, less than  $\frac{3}{4}$  of an inch deep in the seat, requiring less than 40 lbs. of force for attachment, made a huge difference.

In the actual test, only 48% used the top tether and of those, only 22% correctly; lower anchors were used right in 60% of cases. Although 74% of the seats were installed at the correct angle, only a third used the hardware right and 31% got it tight, for an overall correct use rate of 13%. Tether use was perceived as optional by many volunteers, mirroring findings in community safety seat checkups.

Other aspects of the LATCH system that have attracted Technician concern for years were listed. First, the required minimum of 3 tether anchors and 2 LATCH locations was adopted in all but 16 of the vehicles; only 10 had an extra tether anchor, even when the vehicle had 3 rows of seats. No wonder parents think they are optional. And finding lower anchors in center seating positions is rare; only 7 had center LATCH, and 9 more allowed use of inner bars of the outboard locations. As IIHS Senior VP for Research Anne McCartt noted, lacking lower anchors still leaves a belt to attach the safety seat, but there is no substitute for a tether. Campaigning for tether use is essential to reduce risks.

## **Safety Seat Checkup Day, 2012**

Petersen Automotive Museum hosted a busy day serving families from L.A. County with checker team members from 11 different groups in health care, law enforcement, social service, and safety. Children were able to leave more securely buckled up. Thirty-four families brought 50 seats to be checked. Eighty-two percent were found to have anywhere from 1 to 6 errors.

One inspiring report was from Martha Da Silva, who survived a complex crash on a local freeway. Despite broken limbs, she returned to work at Door King, determined to use her Saved by the Belt experience to stimulate her co-workers to protect themselves and their families in the car. With SBS USA materials, she designed educational approaches to engage parents-to-be and workers of all ages.

Maura Gewirtz, CPS Technician and SBS member, pointed out the seat she donated for demo use that was riding, unoccupied, when she was struck by another vehicle.