



NATIONAL
**CHILD PASSENGER
SAFETY BOARD**

A program managed by the National Safety Council

rear facing • forward facing • booster seat • seat belts

July 2015 Instructor Update:

This was sent to all Instructors and Instructor Candidates on July 15, 2015. If you did not receive please check your spam folders and make sure your email address is current in your online Safe Kids certification profile. Thank you!

Please be aware of the regulation changes affecting lower anchorage use of the LATCH system. Between February 27, 2014 and February 26, 2015 there was an amendment to FMVSS 213 which can be found at Docket NHTSA-2011-0176, <http://www.regulations.gov/#!documentDetail;D=NHTSA-2011-0176-0001>.

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The FIRST amendment affecting seats manufactured February 27, 2014 through February 26, 2015:

Specifically, Section S5.5.2(g)(1)(ii) was modified such that child restraint systems (a) equipped with internal harnesses (b) using lower anchors to attach the child restraint to the vehicle anchorage system, and (c) for which the combined weight of the child restraint system and the maximum recommended child weight for internal harness use exceeds 65 pounds (whether forward-facing or rear-facing), must include the following statement on a warning label or an installation label: "Do not use the lower anchors of the child restraint anchorage system (LATCH system) to attach this child restraint when restraining a child weighing more than "\*" with the internal harnesses of the child restraint."

See the attached PDF for the two options for the label for seats manufactured February 27, 2014 through February 26, 2015.

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The SECOND amendment affected seats manufactured on or after February 27, 2015:

As of February 27, 2015, there was a second amendment to FMVSS 213 which can be found at Docket NHTSA-2014-0026, <http://www.regulations.gov/#!documentDetail;D=NHTSA-2014-0026-0001>.

Under this latest amendment, child restraint systems (a) equipped with internal harnesses (b) using lower anchors to attach the child restraint to the vehicle anchorage system, and (c) for which the combined weight of the child restraint system and the maximum recommended child weight for use with an internal harness exceeds 60 pounds rear-facing and 65 pounds forward-facing, must include the follow statement on the installation diagram label: "Do not install by this method for a child weighing more than "X" lbs."

Under this recent amendment, all seats manufactured on or after February 27, 2015, must be labeled as shown in Option 2 above. Currently no infant seats exceed the limit therefore a label is not required.

CRS manufacturers will be responsible to calculate the maximum child weight for the CRS when installed with the lower anchors:

Rear-Facing $X = 60$ minus CRS Weight (lb) and forward-facing $X = 65$ minus CRS Weight (lb). With special guidelines, the child weight can be rounded up to the nearest 5-pound increment.

Some vehicle manufacturers have applied this total weight capacity to tether use for forward-facing installations utilizing the vehicle seat to secure the child restraint. The online publication "Vehicle LATCH and Tether Weight Limits" at <http://cpsboard.org/links-for-techs/> will help you identify tether anchorage weight limits when a child restraint is installed with a vehicle seat belt.

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Next Steps for You:

- \* Inform the caregiver about the new lower anchor weight limits label?
- \* Be aware that some newer child restraints that are very light and have a lower harness weight limit may not have this label.
  - \* The vehicle manufacturers all agree – and have since the 213 Final Rule was published – that the 65 pounds total weight supersedes the prior advice about 40pound child weight, primarily because there are some car seats that weigh over 25 lbs.
  - \* "If there is no stated weight limit for the vehicle lower anchors or tether anchors, and the car seat lower anchors or tether anchors, you MUST assume that they may be used until the total weight of the child and car seat equals 65 pounds."
  - \* Technician Guide on Page 6-6 | <http://cpsboard.org/2014-tg>
- \* Use your judgment on what to teach a caregiver.
  - \* Are they more comfortable with lower anchors rear-facing or LATCH forward-facing?
  - \* Are they more comfortable with the seat belt (and tether when appropriate)?
- \* Remember, we are teaching best practice and current recommendations, but the caregiver is ultimately responsible for making the final decision.
- \* As always, and more importantly than ever, follow all the vehicle and CRS owner's manuals/labels.

As always, thank you for all that you do to keep children safe!

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