



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Administrator

1200 New Jersey Avenue, SE
Washington, DC 20590

May 27, 2011

Mr. Sean Kane
Safety Research & Strategies, Inc.
340 Anawan Street, Suite 200
Rehoboth, MA 02769

Dear Mr. Kane:

Thank you for your letter regarding injuries attributed to vehicle seat heaters. The agency has reviewed the information that you provided, as well as our own data regarding this issue. I appreciate the opportunity to respond to your inquiry.

The agency reviewed consumer complaints alleging injury or potential injury to persons with sensory deficit due to vehicle seat heaters and found 11 cases over the last 8 years. Of these cases, eight alleged an injury, with one seat heater overheating. In the other cases, the seats operated at normal temperatures, and the injuries appeared to be associated with prolonged exposure. While the agency has also conducted several investigations involving overheated seat heaters, the findings indicate that the damages were minor and limited to localized overheating and any associated injuries were less severe than a first degree burn. None of the investigations involved crashes or loss of vehicle control. The agency has also conducted investigations of fires allegedly caused by seat heaters. The root cause analysis noted that the power feed cable to the seat heater or the power seat motor were the cause of the fires, and not the seat heater itself.

Based on our review of the available data, the rate of alleged injury due to seat heaters is extremely low. However, while the data does not reflect a trend demonstrating an unreasonable safety risk, the agency recognizes the potential hazards overheating seats may generate and therefore is going to take several actions.

The National Highway Traffic Safety Administration (NHTSA) will contact associations and other groups representing people with disabilities to raise awareness on seat heater related incidents to prevent future occurrences.

We believe this outreach effort will assist in bringing more attention to this issue so that future injuries may be prevented. We will also request a review of existing insurance claims data to document the number of injury cases involving vehicle seat heaters.

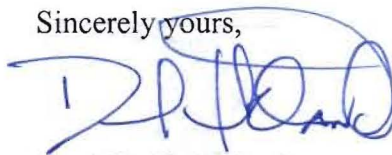
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In addition, NHTSA will contact the Society of Automotive Engineers (SAE) to inquire about the potential development of an industry recommended practice. Based on the limited data available, we believe this approach would be best to efficiently identify potential countermeasures for preventing additional injuries attributed to seat heaters. We believe that the development of an SAE standard could include performance requirements for maximum temperature, an indicator to alert drivers and passengers that the seat heaters are activated, and an auto-shut off feature and location requirements to assure that the indicator is visible.

I hope this information is helpful to you. If you have additional questions please contact Mr. Christopher J. Bonanti, Associate Administrator for Rulemaking, at (202) 366-1810.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "D. Strickland", is written over a horizontal line. The signature is stylized and cursive.

David L. Strickland