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June 9, 2011

David Strickland  
Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE, West Building  
Washington, DC 20590

Dear Administrator Strickland:

Thank you for your response regarding burn injuries associated with seat heaters. We look forward to working with the agency on raising awareness of this issue and on encouraging industry standards that recognize the limits of human heat tolerances.

We are not surprised that the agency found the seat heater burn rate to be extremely low, as enumerated in Vehicle Owner Questionnaires. Establishing the scope of these injuries is difficult. Even data sources such as emergency room visits are not coded in sufficient detail to capture the origin of seat heater-related burn injuries. However, these incidents do exist in far greater numbers than are reflected in the NHTSA complaint data and we will work with NHTSA to provide a more comprehensive perspective.

While complaint volume is certainly a consideration for the agency in formulating responses to automotive safety issues, in this case, we don't believe it should be the primary factor. Human heat tolerances, which are time and temperature dependant, have been well established for more than half a century. Some manufacturers understand this and incorporate maximum temperature limits and timers into their designs. But independent testing confirms that in the real world seat surface temperatures can far exceed their maximum specifications. Excessively high temperatures in combination with designs that lack a time-out feature can and do cause serious burn injuries to occupants with lower body sensory deficits.

We agree that an SAE standard would be helpful. We also believe that the agency can play an important enforcement role and consider designs defective if they exceed well-established human tolerances.

We appreciate the agency's hard work and its willingness to consider action on this issue and look forward to continued communication on seat heater hazards.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sean E. Kane'.

Sean E. Kane