



NOV 10 2004

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November 4, 2004

National Highway Traffic Safety Administration
Docket Room, PL-401
400 Seventh Street, SW
Washington, DC 20590

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Re: Docket No. 19092; Comments on National Highway Traffic Safety Administration's (NHTSA) Proposed Rule to modify Part 595; 69 FR 56018, Sept. 17, 2004

Dear Sir or Madam:

The Adaptive Driving Alliance ("ADA") is an organization serving dealers and manufacturers in the industry modifying and selling vehicles for the handicapped and disabled, often called the "Adaptive Driving Industry" or "Mobility Industry".

The notice of proposed rulemaking in this matter was the result of petitions for rulemaking filed by the ADA, and the ADA therefore fully supports the NPRM and urges NHTSA to make final the proposed changes to Part 595.

ADA would like, however, to suggest two changes to the proposed regulatory language:

1. As regards FMVSS 208: ADA believes that section **S14** of FMVSS 208 should be added to the list of sections set forth in 49 CFR 595.7(c)(14). Since S14 is the section of FMVSS 208 that mandates compliance with the advanced air bag requirements, S14 should be included in Part 595.

2. As regards FMVSS 225: ADA questions whether the final sentence proposed for 49 CFR 595.7(c)(16) is appropriate: That sentence states: "**Any tether anchorage attached to a seat that is relocated shall continue to comply with the requirements of 49 CFR 571.225 S6, S7 and S8.**"

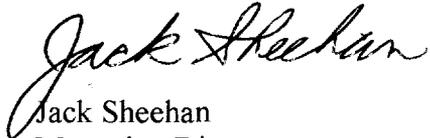
Proposed (c)(16) would require that

"...the vehicle contain[] at least one tether anchorage which complies with 49 CFR 571.225 S6, S7 and S8 in one of the rear passenger designated seating positions. If

no rear designated seating position exists after the vehicle modification, a tether anchorage complying with the requirements described above must be located at a front passenger seat.”

It is thus not clear why the proposed final sentence of (c)(16) is necessary, given that relocating a seat could cause issues as regards maintaining the tether.

Respectfully submitted,

A handwritten signature in black ink that reads "Jack Sheehan". The signature is written in a cursive style with a large, looping initial "J".

Jack Sheehan
Managing Director
Adaptive Driving Alliance