

[REDACTED]  
September 26, 2014

US Department of Transportation/  
National Highway Traffic Safety Administration [NHTSA]  
Office of Defects Investigation  
1200 New Jersey Ave SE  
Washington, DC 20590

RE: Head Restraints Regulations 2009/2010  
Subaru Impreza VIN JF1GPAL62E9 [REDACTED]

OCT 21 2014

To Whom It May Concern:

I am writing in regard to the rulings made in 2009 by the NHTSA, requiring mandatory car head restraints by 2010. I recently attempted to buy a new car after owning a 2000 Honda Civic for the past 14 years. I immediately noticed a difference in the head restraints on the 2014 cars. Since I'm five feet tall and prefer a manual transmission, I have always placed my car seatback in a vertical position; otherwise I would not be able to reach the clutch, steering wheel, gearshift, etc. On my 2000 Honda, this places my head about ½ inch in front of the headrest, providing me plenty of whiplash protection. Ironically, I assumed a new car would be more comfortable than my 2000 Honda, which has always provided me with plenty of back, neck and head support. Unfortunately, this is not the case with the 2014 cars.

On the 2014 cars, the head "restraint" shoves my head forward in an uncomfortable and unnatural position. Although I presume the most forward portion of the wedge-shaped restraint is supposed to be behind my neck, instead it hits the part of the back of my head where the bone sticks out the most, thrusting my head forward to an even greater degree. The top of the restraint is several inches higher than the top of my head, even at its lowest setting. This was true for the 2014 Honda, Hyundai, Mazda and Subaru. I bought a Subaru Impreza because its head restraints seemed to stick out the least amount compared to the other cars (Hyundai and especially Mazda were the worst). During a 10-minute test drive, I was not uncomfortable.

Unfortunately, with longer driving periods of 30 minutes or less, I have accumulated considerable neck and shoulder problems, which have continued to worsen. I have muscle spasms and shooting pains from my shoulder up my neck and jaw and down my chest, back and arm. Despite a great deal of physical therapy, the pains continue. I am unable to drive my new Subaru at all. For a while I could drive my old Honda, but now even that is difficult. I have had to give up swimming and all other forms of upper body exercise. I have difficulty doing most household or yard chores. Despite icing my neck and shoulder several times a day, and various other pain remedies, my neck and shoulder hurt me seriously throughout the day almost every day.

NM

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As a result of these pains, I have been researching on the Internet. I have discovered that the 2009/2010 regulations are based on tests with crash test dummies seated back at a 25-degree angle from the steering wheel, at which time it was decided that head restraints needed to stick out 7 inches to prevent whiplash. I have NEVER seen any driver sit this far back! Moreover, I am certain that no crash test dummies the size of us shorter women, 5'0" to 5'4", were ever used, or the new head restraints would not be over our heads. I guarantee that the headrest arrangement I have on my 2000 Honda is safer than anything developed in 2009/2010, even for drivers over 5'9", and it never caused pain to this short, 5'0" tall driver.

Other articles I read state that over 6% of drivers of cars manufactured in 2010 and beyond have back and neck pains from their head restraints. I cannot fathom how many hundreds of thousands of drivers this must entail. These articles also state that many of these drivers have lost thousands of dollars from trying to fix up their cars to be more comfortable or selling them at a loss. The articles reflect my situation, as I am now spending hundreds of dollars trying to find arrangements of pillows, cushions and seat covers that will remediate my pains. If I cannot fix my situation, then I too will be forced to sell my Subaru for a loss of several thousand dollars, when I have only driven it a couple hundred miles.

I am writing to ask you to please examine and modify the rulings the NHTSA established in 2009 for head restraints. They are overly restrictive, unnecessary, bad for most people's posture, and devastating to shorter drivers and others with existing or potential shoulder, back and neck problems. They are surely unsafe, leading to impaired driving in affected drivers. With all the talent in this country, surely there is a way to protect drivers from whiplash without incurring injuries from the cars themselves! Instead, "it seems that the solution of whiplash injury to the spine causes injury to the spine during normal driving," to quote an article.

I look forward to your reply to my letter!

Sincerely yours,

 Automobile Consumer





Arnold, MD

BALTIMORE MD 212

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