



## COMMENTS ON THE DRAFT OF THE DECREE REGULATING A CAR SEAT REMINDER DEVICE

7 January 2019

### *Art. 3 General characteristics*

In point 1. c) what is specifically meant by “independent” ? (for example, to help us understand, does a cushion sold separately as a “stand alone” product fit this category?)

### *Art. 6 Provisions for the manufacturer*

In point 1. Reference is made to a provision by the General Motorisation Division; what is that provision expected to include and how long before the presentation is proof of approval expected to be communicated?

### *Art. 8 Recognition of bodies*

Considering the limited timing for introducing the Decree, we kindly ask for more details on obtaining the notification by the bodies requesting it (for example list of regulations), especially referred to point 2. d) of annex A, which establishes – correctly in our opinion – “the car seat reminder alarm device must in no way alter the holding system approval characteristics”.

## SCHEDULE A

### *1. Functional characteristics*

In point b), as we see it, “activates automatically” means that the car seat reminder alarm device works after being regularly, initially installed and configured and then connected to any use, based on manufacturer instructions (e.g. bluetooth activation on smartphone), is that correct?

In point c), given that the device activates automatically, as described in the previous point, we suggest replacing with the similar “the driver must be able to check that the car seat reminder alarm device has activated”.

In point d) signals should be perceivable both inside **and/or** outside the vehicle.

In point e) we suggest adding “in addition” as an additional non-binding characteristic: “In addition, the car seat reminder alarm device can activate a communication system indicated in point 2 letter f) below”.

### *2. Technical-construction characteristics*

In point c) ...“with use logics **and/or** that use specific sensors”

In point f), as requested for point 1 e), we suggest that the call system be an additional possibility; this to enable adoption of devices which, though activating visual, acoustic alarm signals, etc. etc., do not necessarily send messages and phone calls. With this in mind, the point could be reconsidered as follows:

f) “ car seat reminder alarm devices, equipped with an automatic communication system, must send messages and/or calls to one or more phone numbers by mobile wi-fi communication networks”