



Mr Pierre Castaing  
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**ANEC/Consumers International (CI) views in response to the CLEPA proposal to allow the use of R44 approved belted infant carriers in combination with an i-size base.**

Dear Mr Castaing

We refer to the CLEPA analysis of future i-Size approval possibilities, submitted as an informal document for consideration at the 53<sup>rd</sup> session of the UNECE Working Party on Passive Safety (GRSP-53-24) that was held on 13-17 May 2013 in Geneva.

Rather than allowing the use of R44 approved infant carrier on an i-size base (as raised in [CRS 37- 04](#) and [GRSP 53-24](#)), we opt to exempt portable infant carriers from the ban on belt use within the new regulation (R1xx).

The infant seat in combination with its base needs to meet all i-size requirements, including side impact protection and stature based classification, and will be type approved accordingly. In belted mode, R44 requirements (e.g. with respect to coding of belt routing and frontal impact) are applicable.

Our justification is that, in this way, all stature-based classified CRS meeting the new requirements will be in one Regulation. R44 can then be kept for mass-based classified CRS, with approvals being stopped after the transitional period.



From the consumers' point of view, this is preferable as it gives a clear message with all state-of-the-art products in the same Regulation. Moreover, it avoids a mix of mass and stature based products, meeting different performance requirements, in one Regulation as would happen under the CLEPA proposal.

Thank you in advance for taking our views into account.

Yours sincerely

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Ayşe Sumer  
ANEC Programme Manager  
Research & Traffic

A handwritten signature in blue ink, appearing to read "R Vroman", with a long, sweeping horizontal line extending to the right.

Ronald Vroman  
ANEC/CI Representative