

# **2009 SAE Government/Industry Meeting**

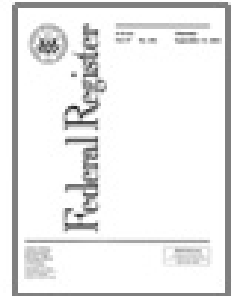
## **Recommended Best Importer Practices to Enhance the Safety of Imported Motor Vehicles and Motor Vehicle Equipment**

**Clint Lindsay  
Import and Certification Division  
Office of Vehicle Safety Compliance  
National Highway Traffic Safety  
Administration  
February 6, 2009**



# Best Practices Notice

- July 2008 NHTSA published FR Notice (73 FR 39018) on proposed recommended Best Practices for importers of motor vehicles and motor vehicle equipment
- NHTSA sought comments from all stakeholders on the suggested Best Practices
- Best Practices are recommended but are not mandatory requirements
- Available for review at [www.regulations.gov](http://www.regulations.gov)  
“NHTSA 2008–0113”



# FR Notice Objectives

Recommended Best Practices:

- 1) Understand Importer's Obligations under Motor Vehicle Safety Statutes and Regulations
- 2) Exercise Great Care in Selecting Foreign Manufacturers
- 3) Inspect Foreign Manufacturing Facilities
- 4) Inspect Goods Either Before They Are Exported To or Distributed In the U.S.



# FR Notice Objectives – cont'd

Recommended Best Practices:

- 5) Identify the Product
- 6) Establish a Consumer Service Program
- 7) Contact NHTSA Concerning  
Manufacturer/Importer Reporting Requirements,  
Safety Compliance, and Defect Issues
- 8) Know How to Obtain General Assistance with  
Other Federal Regulations

# FR Notice Comments

Comments were received from:

- North American Lighting, Inc. of Farmington Hills, Michigan
- Motor and Equipment Manufacturers Association (MEMA) of Research Triangle Park, North Carolina
- Truck-Lite Company, Inc. of Falconer, New York
- Specialty Equipment Market Association (SEMA) of Washington, DC, and
- Ford Motor Company of Dearborn, Michigan



# Summary of FR Notice Comments

- All commenters support NHTSA's efforts to develop guidance
- Commenters said safety is enhanced when manufacturers voluntarily mark products with:
  - Name or trademark of the fabricating manufacturer
  - “Date” or “Lot” Codes
  - Marks specified in industry recommended practices or standards (such as SAE J759 for lighting)



# Summary of FR Notice Comments – cont'd

- Maintenance of records is important
  - 49 CFR Part 576 requires manufacturers to retain for 5 years, certain records relating to malfunctions that may be related to motor vehicle safety
- Make importers aware of Quality Management System ISO/TS16949
  - An internationally recognized QMS specification for the Automotive Industry
  - Jointly developed by the International Automotive Task Force (IATF)



# Final Notice Conclusions

- Final notice addresses all comments raised in the July 2008 proposed notice on Best Practices
- NHTSA's Best Practices are in concert with recommendations of the Interagency Working Group on Import Safety established by President in 2007
- Majority of US major equipment mfrs and one vehicle mfr are in favor of agency's efforts



# Contacts

Office of Vehicle Safety Compliance		
Topic	NHTSA Office / Internet	Telephone No.
General questions about importing vehicles and equipment items	Import and Certification Division	(202) 366-5291
General Importation Information	<a href="http://www.nhtsa.dot.gov/cars/rules/import/">http://www.nhtsa.dot.gov/cars/rules/import/</a>	
Questions about how a manufacturer informs NHTSA about its company and the products it manufactures	Import and Certification Division	(202) 366-5291
Questions about how to provide NHTSA with the manufacturer's vehicle identification number deciphering information	Import and Certification Division	(202) 366-5291
Questions about NHTSA ID numbers that are assigned to equipment manufacturers of brake hoses, glazing (glass), and tires	Equipment Division	(202) 366-5322
Information to Assist New Manufacturers	<a href="http://www.nhtsa.dot.gov/cars/rules/maninfo/">http://www.nhtsa.dot.gov/cars/rules/maninfo/</a>	
Questions about FMVSS as they relate to equipment items	Equipment Division	(202) 366-5322
Federal motor vehicle safety standards (FMVSS)	<a href="http://www.nhtsa.dot.gov/cars/rules/">http://www.nhtsa.dot.gov/cars/rules/</a>	
NHTSA's Manufacturer Databases	<a href="http://www.nhtsa.dot.gov/cars/rules/manufacture">www.nhtsa.dot.gov/cars/rules/manufacture</a>	
Government Vehicle Safety Information	<a href="http://www.safercar.gov/">http://www.safercar.gov/</a>	

# Contacts

Office of Defects Investigation		
Topic	NHTSA Office / Internet	Telephone No.
Questions about Early Warning Reporting (EWR)	Early Warning Division	(202) 366-4238
Early Warning Reporting	<a href="http://www-odi.nhtsa.dot.gov/ewr/ewr.cfm">http://www-odi.nhtsa.dot.gov/ewr/ewr.cfm</a>	
Questions about Defects and Recalls	Office of Defects Investigation	(202) 366-5210
Defects Investigations	<a href="http://www-odi.nhtsa.dot.gov/">http://www-odi.nhtsa.dot.gov/</a>	
Office of Chief Counsel		
Topic	NHTSA Office / Internet	Telephone No.
Questions about how the statutes and regulations administered by NHTSA are interpreted	Office of Chief Counsel	Requests for interpretations should be made in writing.
NHTSA Chief Counsel interpretive letters	<a href="http://isearch.nhtsa.gov/">http://isearch.nhtsa.gov/</a>	
NHTSA Statutory Authorities	<a href="http://www.nhtsa.dot.gov/nhtsa/Cfc_title49/index.html">http://www.nhtsa.dot.gov/nhtsa/Cfc_title49/index.html</a>	
NHTSA Regulations	<a href="http://www.nhtsa.dot.gov/cars/rules/">http://www.nhtsa.dot.gov/cars/rules/</a>	
Questions about how to designate a U.S. resident as an agent for service of process	Office of Chief Counsel	(202) 366-1834
Suggested Designation of Agent for Service of Process 49 CFR Part 551, Subpart D	<a href="http://www.nhtsa.dot.gov/cars/rules/manufacture/agent/customer.html">http://www.nhtsa.dot.gov/cars/rules/manufacture/agent/customer.html</a>	

Questions?

