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February 11, 2008

Mr. Bruce A. Mather,  
Lap Belt Cinch, Inc.  
50Slashpine Circle,  
Hockessin, DE, 19707

Mr. Mather,

In response to your inquiry as to the applicability of the 49 CFR 571 - Federal Motor Vehicle Safety Standards (FMVSS) to your "CG Lock" product, it is our understanding that the "CG Lock" is not a regulated motor vehicle component and is therefore not subject to the 49 CFR 571. After reviewing the "CG Lock" you provided to us and the National Highway Traffic Safety Administration's (NHTSA) interpretation letters, we believe that your product can be defined as an aftermarket readily detachable component. Such components are not required to meet the 49CFR571 but they may be considered motor vehicle equipment and therefore subject to the recall requirements of 49CFR.

The precise comparison sled crash testing you have conducted, as reported in the Via Test Labs test report dated 03/08/03, indicates that the "CG Lock" does not negatively impact the performance of the original seat belt system and that test results are very similar to, and within the same acceleration responses as, the original seat belt.

If you have any questions or you would like to further discuss the applicability of the FMVSS to your product, please contact us at your convenience.

Regards,

Jacques Bolduc, P. Eng.  
SRD Bolduc Inc.