

**Comparison of Head Restraint Regulations
U.S. FMVSS 202, U.S. FMVSS 202 Proposed Rule, and ECE 17/25)**

Head Restraint Component	U.S. – FMVSS 202	US FMVSS 202 NPRM	ECE 17/25	Comments
A. Application				
1. Vehicles				
Passenger cars, MPVs and trucks with a GVWR ≤ 4536 kg	Front outboard seating positions	All outboard seating positions	ECE 17: Required in front outboard positions, optional in other positions, in vehicles with ≤ 9 seating positions (M1)	US required in all outboard vs ECE that requires only front outboard, but if HR present in rear seat, ECE regulates.
2. Requirements				
a. Height				
1. Front outboard				
A. Fixed	At least 700 mm above H-point as measured parallel to the torso reference line	Increased to 800mm	Same as NPRM	
B. Adjustable	Same as 202-fixed	Must achieve a height of 800 mm and cannot be adjusted below 750 mm.	Same as NPRM	
2. Rear outboard				
A. Fixed	Not specified	Minimum height of 750 mm above H-point	If HR available, same as NPRM	
B. Adjustable	Not specified	No adjustment below 750 mm	If HR available, same as NPRM	
3. Rear Center				
	Not specified	Not specified	If HR available, minimum height of 700 mm	

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b. Backset				
1. All outboard positions	Not specified	Backset limited to a maximum 50 mm in any adjustment position as measured with HRMD.	Not specified.	
c. Width				
1. Front outboard	Minimum of 171 mm on single seats and 254 mm on bench seats	Same as 202	Minimum of 170 mm for all seat types	-171/170 difference due to rounding -US requires wider HRs on bench seats.
2. Rear outboard	Not specified	Same as above	If HR available, minimum of 170 mm.	-171/170 difference due to rounding
d. Height of adjustable head restraint front surface				
	Not specified	Not specified	Minimum height of 100 mm	
e. Gaps				
1. All outboard positions	Not specified	-In lowest position, gap between HR and seat back is ≤ 25 mm, for a single backset adjustment. -In other positions, gap cannot exceed 60 mm -Both measured with a 165 mm diameter sphere placed in front of the HR.	-In lowest position, gap is ≤ 25 , with no reference to backset adjustment. Measured along straight line between HR and seat back. -In other positions the gap ≤ 60 mm as measured with 165 mm dia. sphere, or must pass a load test.	

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f. HR Adjustment Retention Devices (locks)				
1. Height	Not specified	Must maintain height in several positions, including maximum and minimum, while a downward force is applied.	If adjustable, requires automatic locking system (ECE 17, 5.1.1). No downward test required.	ECE has no downward testing requirement.
2. Backset	Not specified	Under applied rearward moment, while adjusted to 800mm for front and 750mm for rear, HR must maintain any position of backset adjustment.	Not specified.	
g. Removability				
1. Front	Not specified	Cannot be removed solely by hand (tools required)	Can be removed with deliberate action distinct from any act necessary for adjustment.	US proposed rule more specific (stringent).
2. Rear	Not specified	Can be removed by hand.	Same as above	
h. Clearance				
	Not specified	25 mm clear space allowed where rear HRs, when seat is occupied, interfere with roofline or rear window. Minimum seat height could be less than 700 mm.	If HR available, 25 mm clear space allowed where interference with vehicle structure. Seat does not need to be occupied. Minimum height of 700mm must be maintained.	Requiring a minimum height would force some vehicle manuf. to alter roofline. Not an issue in ECE. If no HR, minimum height does not need to be met.

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i. Non-use positions				
1. Front	Not specified	Not allowed	Allowed, provided HR automatically returns to proper position when seat is occupied.	
2. Rear	Not specified	Allowed, provided HR automatically returns to proper position when seat is occupied or non-use position changes torso angle by 10° as measured with H-point device.	Allowed as long as non-use position is “clearly recognizable to the occupant”.	US proposed rule more stringent. Only allows HRs that can fold forward or are automatic.
j. Radius of Curvature				
	Not specified	Any part of the HR outside of the impact zone for the energy absorption requirement must not have a radius smaller than 5mm.	Same as NPRM. Refers to the back of the head restraint.	202 does not apply to the back of the head restraint.
k. Energy Absorbtion				
	Not specified	Front of HR impacted with head form at v=24.1 km/h. 3ms deceleration of head form must not exceed 80gs . Impactor is free motion head form with mass of 6.8 kg.	Similar to NPRM: Uses pendulum impactor with same weight and velocity as linear impactor.	Results should be the same.

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l. Displacement Test Procedures				
	Load is applied to back pan of seat, load is applied to head restraint after seat load is removed. 102 mm of displacement allowed with 373 Nm moment. Load is increased until 890N or seat back fails. Use spherical or cylindrical form to apply load.	Test procedure modified from 202. Seat back and HR loaded together. Moments and displacements same. Maximum load the same, seat back cannot fail. Use spherical form to apply load	Same as NPRM	
m. Dynamic sled test				
	Seat accelerated so the pulse falls in a corridor defined by 2-½ sine waves with amplitudes of 78 m/s ² and 86 m/s ² . Corridor cannot be met. 95 th male dummy used, max rotation 45°.	New corridor based on scaled version 208 sled test. Target pulse the same as 202. Tested with 50 th and 95 th male dummy. 50 th max rotation 12° w/HR in min position. 95 th max rotation 20° w/HR in min position.	Not specified	