

## Comment from Nicholas Audino

To Whom It May Concern,

The European model does not require shoulder harnesses in side facing seats due to the odds of serious neck injury or worse in a forward impact. Shoulder harnesses mounted towards the rear of the coach serve absolutely no purpose due to the fact that the occupant would be thrown to the side. The lap belt is the only belt that actually restrains the occupant. There's no statistics and no test models to back up any claim that belt restraint in any form will add to the safety of the occupants. Seat belts purpose are to safeguard against ejection from the vehicle as a result of a crash. No occupants have ever been ejected from an entertainer coach in the U.S.. Statistically, the entertainer coach industry is the safest mode of transportation on the highway today. Please keep in mind that these regulations were targeted for the seated bus industry and not for the conversion/entertainer coach industry. This has caused a great expense to manufacturers and operators with no proven advantage to the occupant. I'm surprised that congress has passed such regulations considered that the majority of candidates actually use these coaches to campaign yet not one of them ever required a seat belt.

Best,

Nicholas E. Audino

C.E.O

Superior Coach Interiors Inc.