from "one fifth the circumference of the helmet" to 120 mm.

Response: The Commission believes that 120 mm allows sufficient distance to minimize the effects of impact site proximity and provides a more straightforward measurement than the original one-fifth circumference criteria. Accordingly, the Commission proposes to adopt this recommendation.

Comment: Impact velocity tolerance. One commenter suggested a change from $\pm 2\%$ to $\pm 5\%$ for the tolerance on impact velocity.

Response: Tests by CPSC staff indicated that helmet impact velocities sometimes fell outside the proposed $\pm 2\%$ tolerance. However, the impact velocities almost always were within $\pm 3\%$ of the specified value. These tests showed that a $\pm 3\%$ velocity tolerance is reasonable to maintain a test procedure that will reliably indicate the equipment is functioning properly. Accordingly, the velocity tolerance for helmet testing has been changed to $\pm 3\%$ in the revised proposal.

Comment: Number of helmets required for testing. Comments were submitted requesting clarification of the number of helmet samples needed if attachments are provided with the helmet and if the helmet fits two headform sizes.

Response: An additional set of five helmets is needed for each additional attachment (e.g., visors or shields), or combinations thereof, sold for use with the helmet. Two additional samples per set are needed if the helmet fits two headform sizes.

Comment: Fit and testing. A comment stated that the standard needed to define "fit" as it relates to the process of selecting a test headform. Another comment provided a definition of "fit" and suggested that the language for selecting a test headform should more clearly explain how a sample set of helmets is divided when a helmet fits two different headform sizes.

Response: Language addressing these concerns, including a definition of "fit," has been added to the revised proposed rule.

Comment: Wet-conditioning. A number of commenters suggested that wet-conditioning by totally immersing the helmet in water is unrealistically severe. These commenters recommended that the Commission consider a water-spray environment.

Response: Commission testing of both immersed and water-sprayed helmets under various time durations showed no consistent trend in resulting peak acceleration levels. The immersion environment has the advantages of being easier to define and of subjecting the helmet to a uniform conditioning exposure. Since testing showed that these commenters' concerns are unfounded, the Commission is retaining the immersion method of wetconditioning in the proposed standard. However, additional specifications to standardize the wet environment are included.

Comment: Anvil test schedule. In the originally proposed standard, helmets 1 through 4 would have been tested with the flat and hemispherical anvils and the fifth helmet would be tested with the curbstone anvil. Two commenters suggested that there is no reason for a curbstone anvil impact to be treated differently from the flat and hemispherical anvil impacts.

Response: Each anvil has a unique "imprint" that could stress helmet designs differently. Therefore, the proposed standard has been revised so that each of test helmets 1 through 4 must meet the standard's impact criteria on four impacts, once with each of the three anvils and once with the anvil likely to result in the highest g-value. In the absence of an indication why another anvil would be more stringent, this fourth impact should be made with the anvil that produced the highest gvalue in the previous three impacts. This is consistent with the test schedules of the Snell B-90(S), N-94, and B-95 helmet standards. (Under the revised proposal, the fifth helmet is tested only for positional stability.)

Comment: Helmet straps. A commenter recommended that the test procedure require that all slack be removed from the helmet straps when fastening the helmet to the test headform.

Response: The Commission agrees with this comment and has revised the proposal accordingly.

Comment: Lateral positional stability test. A commenter recommended the addition of a positional stability test in the lateral direction.

Response: The shape of the head is such that a properly fitted helmet is more likely to come off to the front or rear than to the side. Accordingly, the suggested lateral positioning test is unnecessary and not proposed.

Comment: Dynamic v. static-load positional stability test. One commenter suggested that the CPSC consider the static load positional stability test specified in the Canadian Standards Association ('CSA') bicycle helmet standard.

Response: The Commission believes that a dynamic test provides a more rigorous and realistic test of the restraint system, and has not adopted this suggested change. *Comment:* Retention system test schedule. Some commenters asked that the CPSC consider a change to the test schedule so that at least one impact attenuation drop per sample would be performed prior to testing the retention system.

Response: CPSC staff testing did not show evidence to warrant a change in the sequence of retention system strength tests and impact tests. Accordingly, the Commission did not make this suggested change.

Comment: Use of a Rubber Pad on the Stop Anvil. One commenter recommended using a rubber pad between the steel drop mass and the stop anvil.

Response: The current ASTM and ANSI bicycle helmet standards do not require a rubber pad on the stop anvil. Based on comparison testing with and without a rubber pad, the Commission believes a rubber pad may produce a somewhat less stringent test. In the absence of any compelling reason to allow a rubber pad, therefore, the Commission has not changed the original proposal in this regard.

Comment: Self-release buckle. One commenter suggested that consideration be given to requirements for a selfrelease buckle that could be used to prevent strangulation if the helmet becomes caught. The commenter stated that there are now efforts in Europe to develop a test method that would ensure that buckles release or break away when subjected to a load equivalent to the weight of a child.

Response: The Commission has received reports of eight or nine deaths of children in Sweden and Norway that occurred when helmets became caught in trees or playground equipment, causing the child to become suspended by the chin strap. The Commission also has received reports of four nonfatal incidents in the United States since 1990, involving children of ages from 5 through 7 years, that occurred in the same fashion.

However, the Commission is not proposing requirements for a self-release buckle at this time. Considering the frequency and potential severity of head injuries in bicycle accidents, it is important to ensure that the helmet retention strength requirements are not compromised.

Comment: Use labeling. A number of comments concerned what information should be on a bike helmet label to inform consumers of the helmet's intended use. Some commenters favored the "Not For Motor Vehicle Use" label that was first proposed in the CPSC standard. Others felt the helmet should be labeled "For Bicycle Use Only."