

National Highway Traffic Safety Administration Ease-of-Use Ratings Program Conditions of Use

Ease-of-Use Ratings Program in Advertisements

The National Highway Traffic Safety Administration (NHTSA) created the Ease-of-Use ratings program to provide consumers with a ratings system that allows them to evaluate how easy certain car seat and booster seat features are to use before buying a seat. All car seats that NHTSA rates for ease-of-use are self-certified by the car seat manufacturer to meet federal safety standards, including strict crash performance standards. They differ in their Ease-of-Use in four basic categories: clarity and consistency of instructions; vehicle installation features; clarity and consistency of labels; and securing the child. NHTSA encourages car seat manufacturers and advertising agencies to use the Ease-of-Use ratings in advertisements, subject to the conditions outlined below.

These conditions, which are intended to promote accurate characterization and comparison of the Ease-of-Use program, apply to all advertisements, such as print, online, mobile, TV, and radio, as well as press releases and other consumer-based marketing communications. The conditions also identify some practices that could lead to inaccurate or misleading use of the Ease-of-Use ratings. Failure to conform to these conditions may result in Buyer Alerts on NHTSA.gov, or the issuance of a press release or other alert, to inform potential consumers and correct the misstatement. Egregious misstatements or mischaracterizations may result in a demand to the manufacturer that it terminate its use of all references to the Ease-of-Use ratings program in its advertisements. (See Failure to Abide by Conditions of Use section.)

Appropriate Claims

An advertisement should convey clearly that it concerns an Ease-of-Use rating and not a safety performance rating. There should be no safety claim relating to the Ease-of-Use ratings.

<u>Definition of a "Top Star Rating" – And Acceptable Use in Advertising</u>

A five-star rating as the **overall** Ease-of-Use rating should be achieved before the car seat/booster seat can be characterized as receiving "top stars," a "top star rating," the "highest Government Ease-of-Use rating," or the "highest NHTSA Ease-of-Use rating."

Competitive Comparisons

Advertisements that competitively compare Ease-of-Use ratings of two or more car seats/booster seats can be done only if the seats being compared are the same type (e.g., infant car seat, convertible car seat, booster).

Retest Timing – Requirement of Disclaimer

For car seats/booster seats that change mid-model year and which are subsequently officially re-rated, an advertisement should include in the disclaimer that the revised Ease-of-Use rating applies only to seats manufactured on or after the re-rated seat's date of manufacture.

Use of the Ease-of-Use Logo

The Ease-of-Use logo may be used in an advertisement (print, online, mobile, or TV), along with Ease-of-Use ratings, provided the logo is displayed in immediate proximity to the Ease-of-Use rating. This ensures that the association with the advertisement is limited to the Ease-of-Use rating and not to the contents of the entire advertisement. An advertisement may not use the Ease-of-Use logo in any way that implies endorsement by NHTSA, nor otherwise imply that a particular Ease-of-Use rating constitutes an endorsement by the government.

Questions pertaining to advertisements that incorporate NHTSA's Ease-of-Use logo with the Ease-of-Use ratings should be directed to NHTSA's Office of Communications and Consumer Information at 202-366-9550 or submitted via e-mail at public.affairs@dot.gov.

A vector-based image of the NHTSA Ease-of-Use logo is available for download at: https://www.nhtsa.gov/car-seats-and-booster-seats/car-seat-ease-use-ratings.

The logo is shown below and the logo is full color (CMYK).



NHTSA Attribution Requirement

The following statement should appear in any advertisement using the Ease-of-Use ratings: "Government Ease-of-Use ratings are part of the National Highway Traffic Safety Administration's (NHTSA) Ease-of-Use Ratings Program. Use of the Government Ease-of-Use rating in this advertisement does not constitute or imply an endorsement by NHTSA or the United States Government of the product or the product's manufacturer or provider."

Failure to Abide by Conditions of Use

NHTSA will contact the manufacturer should the agency become aware of any advertisement or public statement that misrepresents the Ease-of-Use program, and may issue a press release or other alert to potential consumers identifying the misrepresentation and correcting the statement. Egregious misstatements or mischaracterizations of a car seat or booster seat's Ease-of-Use ratings may result in a

formal request from NHTSA that the manufacturer terminate its use of all references to the Ease-of-Use ratings program in its advertisements.

As a condition of using the Ease-of-Use ratings system in an advertisement, a manufacturer should not do any of the following: (1) publish an inaccurate overall Ease-of-Use rating; (2) claim that a car seat/booster seat received an overall star rating higher than five stars; (3) make a claim that is intentionally misleading to the public; (4) claim an enhanced star rating by means such as higher numbers, plus symbols, or other implications of greater value; (5) advertise Ease-of-Use ratings or use the NHTSA, DOT, NHTSA.gov or Ease-of-Use logos for car seats/booster seats that have not been rated as part of the agency's program; or (6) advertise any of the four specific Ease-of-Use categories instead of the overall Ease-of-Use rating.

Misstatements or mischaracterizations of the agency's Ease-of-Use ratings, such as those outlined above, may result in a demand to the manufacturer that it terminate its use of all references to the Ease-of-Use ratings program in its advertisements.

If a manufacturer makes inaccurate or misleading statements in any media, including print, TV, radio, online, or mobile, regarding any of the Ease-of-Use ratings for a car seat or booster seat that is sold in the United States, NHTSA may take any or all of the following actions:

- Place a "Buyer Alert" notification on NHTSA.gov in immediate proximity to the correct ratings of the car seat/booster seat until the inaccurate or misleading statement is removed from all places it is displayed.
- Place an explanation of the inaccurate or misleading statement in a footnote on NHTSA.gov in all locations where the ratings information for the car seat/booster manufacturer is displayed.
 This may include a statement on the website's homepage alerting consumers to the manufacturer's inaccurate or misleading statement of the Ease-of-Use rating system or logo.
- Issue a press release about the inaccurate or misleading statement to inform consumers.
- In the case of an egregiously inaccurate or misleading statement, remove the ratings from its
 website and notify the manufacturer that it is no longer permitted to use this information in its
 promotions.