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02 December 2001

Sports Car Club of America Competition Board, Club Racing 9033 E. Easter Place Centennial, CO 80112

Re: Request for Clarification

In the October 2001 Fastrack, GCR 18.1.2, GCR 18.2.10, and GCR 18.3.5 were revised as follows:

"FIA homologated seats need not have seat back attached to roll structure if seat manufacturer recommends, within their mounting instructions, that seat back remain unattached to roll structure. Competitors shall have manufacturer recommendation in writing."

The Competition Board is to be applauded for taking this step. The FIA, as part of its homologation process, approves seats based on specific mounting. To make wholesale changes to this approved mounting is unsafe and has unexpected and unknown consequences.

I have made arrangements to purchase an FIA homologated seat for Improved Touring competition. However, in my quest to obtain a copy of the manufacturer letter as specified by the new rule change, I have learned two things:

- No manufacturer of FIA homologated seats recommends that the seat back be secured to the rollcage, and
- Due to liability concerns, every manufacturer is loathe to provide a letter to an individual stating specific mounting methods.

I have sent letters to every major seat manufacturer advertising in *SportsCar* magazine, requesting a list of their FIA homologated seats and a letter to satisfy the SCCA rule. To date I have not received any of those letters. However, I have received phone calls and emails from several manufacturers. In each case the representatives were adamant that their FIA-approved seat *not* have the seat back attached to the rollcage structure; all have stated that to do so would compromise the integrity of the seat and endanger the safety of its occupant. An excerpt from one email:

" Our seat are made to absorb inertia away from your body. If you mount any part of the seat other than the base to the structure of your car you eliminate that safety feature."

Each has also explained that due to liability concerns they cannot (or will not) provide specific mounting recommendations other than "securely mounted to the structure of the automobile."

I understand the intent of the revised SCCA ruling is to encourage competitors to use higher quality FIA-approved seats yet needs to verify in each case that the seat is designed to withstand the forces on the unsecured seat back. However, unless a competitor were able to obtain these individual letters from each manufacturer this rule change could be more detrimental than beneficial as competitors improperly mount their FIA-approved seats.

I would like to suggest that it is possible to get this verification without the individual letters requirement.

The FIA standards for competition seats are specified in FIA Technical Regulation 8855-1999. It can be found at

http://www.fia.com/Regle/REG_TEC/Normes/normes-f.htm

more specifically the file

http://www.fia.com/Regle/REG_TEC/Normes/8855-1999_Competition_seat.exe

which is a self-extracting Microsoft Word document. The English translation is available after the end of the French version. Two points to note in that document:

- 1.1.1 The seats shall be rigidly fixed to the test rig using the attachment points and supports foreseen by the seat manufacturer.
- 1.1.2 Each seat shall be homologated with its type of supports: lateral supports, lower supports. The tests described below shall be carried out with the type of supports defined by the manufacturer at the time of the homologation. One and the same seat may be homologated with different types of supports (lower, lateral). In this case, two complete series of tests shall be carried out. The type of supports with which the seat was homologated will be clearly indicated in the test report and on the list of FIA-homologated seats.

The seats were homologated using specific methods of support. If the seat was not homologated using a seat back support (and most are not), then to use that seat back support violates the FIA homologation of the seat.

The list of seats approved to FIA homologation can be found at:

http://www.fia.com/regle/Reg_tec/listesTech/L12_Approved_seats.pdf

This document, "Seats homologated on the basis of the FIA Standards 8855-1992 and 8855-1999", lists the manufacturer, seat model, date of homologation, homologation number, and the specified type of support to be used (bottom mount, lateral mount, etc) for each seat approved to their homologation standards. Most are listed as using bottom/lower and lateral (side) mounting systems with no mention of seat back support.

Because of the varied types of automobiles that any seat may be mounted to, it is not within the seat manufacturers' best interests to offer specific mounting of the seat other than by using the FIA-approved mounting points of the seat and by "using a secure method of attaching it to the structure". However, this method of attachment to the structure can (and should) be reviewed on each individual car by the SCCA Technical Inspection crew on a regular basis.

Use of these two FIA documents, coupled with competitor-provided proof of seat make and model and the SCCA Tech inspection review, can satisfy requirements for the FIA homologation of the seat and its secure and safe method of seat attachment.

To that end, I would offer that the SCCA revise GCR 18.1.2, GCR 18.2.10, and GCR 18.3.5 to state:

"The driver's seat shall be securely mounted to the structure of the car. In cars where the seat is upright, the back of the seat shall be firmly attached to the main roll hoop or its cross-bracing.

FIA homologated seats need not have seat back attached to roll structure if the seat is mounted as per FIA homologation testing standards for that seat make and model. Competitors shall have, in writing, traceable proof of seat manufacturer, make, and model; a copy of the homologation standards to which it was approved; and verification of homologation of that seat model listing approved mounting method(s)."

This would satisfy the requirements for SCCA's proof of homologation and mounting methods, and release the manufacturer from having to state in writing to each individual SCCA competitor its mounting methods approval. Further, it would place the burden of "secure mounting" back on the competitor, easily verified by the experienced SCCA Technical Inspection team.

Should you have any questions or comments, please feel free to contact me.

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