

# What the experts say

## NHTSA – Capacity & Seat Removal

- **“The seating capacity of a vehicle is determined by the manufacturer’s original design and certification, not by the number of seats currently installed.”**  
— *NHTSA Interpretation Letters*
  - **“Removing seats does not change the vehicle’s original seating capacity or its classification.”**  
— *NHTSA Office of Chief Counsel*
  - **“Post-manufacture modifications such as seat removal do not alter the vehicle’s compliance obligations or safety risks.”**  
— *NHTSA Guidance on Vehicle Alterations*
- 

## NHTSA – 15-Passenger Van Safety

- **“Fifteen-passenger vans have a higher rollover risk than other types of vehicles, especially when fully or nearly fully loaded.”**  
— *NHTSA Safety Advisory*
  - **“As the number of occupants increases, the rollover risk increases dramatically.”**  
— *NHTSA Vehicle Safety Research*
- 

## NTSB – Crash History & Risk

- **“Fifteen-passenger vans are associated with a higher rate of single-vehicle crashes and rollovers.”**  
— *NTSB Safety Report*
  - **“The handling characteristics of these vans degrade as passenger loads increase, increasing the likelihood of loss-of-control crashes.”**  
— *NTSB Crash Investigation Findings*
- 

## FMCSA – Passenger Safety Alignment

- **“Vehicle seating capacity is based on the manufacturer’s original design and certification.”**  
— *FMCSA Passenger Carrier Guidance*
- **“Modifying seating does not change the inherent safety risks or regulatory classification of the vehicle.”**  
— *FMCSA Regulatory Interpretation*