

May 20, 2022

Via Electronic Mail

Dr. Steven Cliff
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Deputy Administrator Cliff:

Our organizations support the petition for rulemaking recently filed by the Insurance Institute for Highway Safety (IIHS) and the Highway Loss Data Institute (HLDI) to require passenger vehicles be equipped with automatic emergency braking (AEB) that responds to pedestrians, including those who use wheelchairs or other assistive devices, in all light conditions. Advocates and other stakeholders including IIHS-HLDI have been urging the National Highway Traffic Safety Administration (NHTSA) to take such commonsense action as doing so would significantly improve safety on our nation's roads.

Tragically, pedestrian deaths occur all too frequently and have been on the rise. According to data recently released by NHTSA, 7,342 pedestrians were killed in 2021, the highest such total in over three decades (1981). Pedestrian deaths are up nearly 79 percent from 2009 and accounted for 17 percent of crash deaths in 2021. Additionally, nearly 55,000 pedestrians were injured in 2020 (latest data available). For every single death and serious injury, there is a horrific ripple effect forever changing the lives of family, friends and communities. These deaths do not happen in a vacuum -- they impact many others, as well as our society at large.

As thoroughly demonstrated in the petition, pedestrian AEB can help to prevent these tragedies. Research performed by IIHS-HLDI indicates that these safety systems can reduce pedestrian crash risk by as much as 33 percent. However, over a third of pedestrian deaths occur in dark/unlighted conditions, and research also indicates that today's pedestrian AEB systems do not reduce pedestrian crash risk in the dark without street lighting. Further, testing performed by IIHS-HLDI and NHTSA indicates that pedestrian AEB systems have the ability to properly perform in the dark. Therefore, requiring that these systems function in all light conditions will lead to a greater reduction in the grim statistics noted above.

Walking should not be a death-defying act. The undersigned urge NHTSA to grant the petition and expeditiously promulgate a rulemaking to require passenger vehicles be equipped with automatic emergency braking (AEB) systems that respond to pedestrians in all light conditions including those who use wheelchairs or other assistive devices.

Sincerely,

Catherine Chase
President
Advocates for Highway and Auto Safety

Mike McGinn
Executive Director
America Walks

Jill Ingrassia
Executive Director
AAA Advocacy & Communications

Georges C. Benjamin, MD
Executive Director
American Public Health Association

Michael Brooks
Acting Executive Director
Center for Auto Safety

Dara Baldwin
Director of National Policy
Center for Disability Rights, Inc

Jack Gillis
Former Executive Director
Consumer Federation of America

William Wallace
Associate Director, Safety Policy
Consumer Reports

Rosemary Shahan
President
Consumers for Auto Reliability and Safety

Carol Tyson
Government Affairs Liaison
Disability Rights Education and Defense Fund

Amy Cohen
Co-Founder
Families for Safe Streets

Janette Fennell
Founder and President
Kids and Car Safety

Bill Nesper
Executive Director
League of American Bicyclists

Corinne Kisner
Executive Director
National Association of City Transportation Officials

Sally Greenberg
Executive Director
National Consumers League

Lorraine Martin
President and CEO
National Safety Council

Torine Creppy
President
Safe Kids Worldwide

Stephen Hargarten, MD, MPH
Founding President
Society for the Advancement of Violence and Injury Research

Andrew McGuire
Executive Director
Trauma Foundation

Leah Shahum
Founder and Director
Vision Zero Network