June 7, 2022

Dr. Steve Cliff
Administrator, National Highway Traffic Safety Administration
Department of Transportation
1200 New Jersey Avenue SE, West Building
Washington, D.C. 20590

Re: New Car Assessment Program (Docket NHTSA-2021-0002)

Dear Administrator Cliff,

Thank you for the opportunity to comment on the updates to the New Car Assessment Program (NCAP). Vision Zero Network is a non-profit project committed to advancing the goal of Vision Zero – zero traffic deaths and severe injuries among all road users – across the nation. The role of vehicle safety performance in achieving this goal cannot be overstated. The NCAP updates are coming at a critical time of surging traffic deaths in the U.S., especially among people who are outside vehicles, including those walking and bicycling. With pedestrian deaths at a tragic 33-year high, these long-overdue steps are needed to help NCAP deliver on improving safety.

We commend the NHTSA's recognition of the outstanding role of vehicle safety in addressing the traffic safety crisis in this nation and its rapid response to the National Roadway Safety Strategy (NRSS) proposal regarding the key actions for improving vehicle safety features.

Giving the important role that NCAP plays in incentivizing vehicle manufacturers and consumer choice, we recommend considering the following safety features as a part of the updated NCAP:

Advanced Driver Assistance Systems must include the consideration of people outside vehicles as a crucial part of the rating system. Although the NCAP update integrates *some* technologies like pedestrian automatic emergency braking (PAEB), lane keeping (LKS) and blind spot detection technologies (BSI and BSW), these features have serious limitations that jeopardize the critical goal of equitable mobility.

- According to the study conducted by Insurance Institute for Highway Safety (IIHS), existing AEB technologies are inefficient in areas without street lights and in areas with speed limits of 50 mph and higher. Also, AEB technologies need more evolution on several other issues like recognizing pedestrians regardless of their skin color, height, walking in groups, and pushing or carrying objects. These serious AEB limitations must be carefully considered and should affect the safety rating system appropriately.
- AEB technology that recognizes people bicycling and users of other forms of micro mobility devices must be included in the current NCAP update. Cyclist AEB is already included in the EuroNCAP as well as similar assessment programs in Australia and Japan. Considering the rising number of deaths of people using bicycles, which was recognized as an urgent issue by USDOT's National Roadway Safety Strategy, we

urge NHTSA to ensure that AEB technology detects cyclists and people using other micro mobility devices.

- We urge NHTSA to make sure that LKS technology that helps drivers to keep vehicles centered in the lane should provide a minimum of three feet of space for cyclists when a driver makes maneuvers.
- The current NCAP update should include BSI and BSW technologies with abilities to detect people walking and bicycling and all those who are outside a motor vehicle. According to the IIHS study, vehicles with blind spot monitoring systems have 14% and 23% lower involvement in fatal crashes and crashes with serious injuries, respectively, than vehicles without these systems.

Intelligent Speed Assistance (ISA) that can automatically identify and intervene when drivers are speeding (adjust the vehicle speed to the posted limit or prevent the driver from exceeding the limit) should be included in the current NCAP update. High speeds significantly increase the likelihood of severe injuries and deaths, especially for pedestrians. A person hit by a motor vehicle traveling at 20mph has an estimated 8% chance of dying; at 30mph, their chance of death increases to 20%; at 40mph, their chance of death jumps to 46%. High speed increases drivers' reaction time and braking distance, and it also reduces drivers' field of vision. More than one-third of fatal crashes are speeding-related. The importance of speeding prevention cannot be overemphasized in advancing roadway safety. EuroNCAP's testing protocol includes ISA which is now being mandated in all new vehicles in the EU after the EU's European Transport Safety Council found that ISA resulted in a 30% reduction in collisions and a 20% reduction in deaths.

The NCAP update should address protection of people outside the vehicle with regard to **vehicle size and design**. According to this IIHS study, pickups were 80% more likely and SUVs 61% more likely than regular cars to be involved in a crash with a pedestrian walking or running along the road (away from intersections). Pickup trucks are 4 times more likely and SUVs are 3 times more likely to cause a fatal crash when making a left turn. The NCAP update should take these critical safety considerations into account and rate unnecessarily oversized vehicles appropriately as less safe for people outside the vehicles. Given the fact that more than three out of every four new passenger vehicles sold in the U.S. are trucks and SUV models, it is essential to ensure pedestrians and others' safety outside the vehicles are added to the testing program.

The NCAP update notably does not mention in-vehicle distracting factors for drivers, such as **onboard screens and other infotainment systems**. We recommend NHTSA incorporate the evaluation of vehicle infotainment systems and its performance as a part of rating assessment, perhaps using Visual-Manual Driver Distraction Guidelines developed by NHTSA.

We urge NHTSA to work quickly to incorporate these changes as a way to modernize the NCAP system, moving past the status quo approach, which is blocking progress on safe mobility, especially for our most vulnerable road users. The nation has fallen behind on our safety responsibilities, and this NCAP update process is one essential step to recover and move the needle forward on safety.

These proven safety measures and underlying tools and technologies exist today and are being used effectively in other countries. And they are directly in line with the USDOT's Safe System approach, as committed to by Secretary Buttigieg and in the National Roadway Safety Strategy.

We owe people traveling in the U.S. meaningful commitments to the Safe System approach, including in vehicles. NCAP can and should play a role in advancing the worthy goals of safe mobility laid out in the National Roadway Safety Strategy by better prioritizing the needs of people walking, biking, and others outside motor vehicles.

We thank you for your attention and we urge swift actions on these safety recommendations. We are happy to answer any questions. And we look forward to continuing our work advocating for safe mobility for all.

Sincerely,

Leah Shahum
Founder & Executive Director
Vision Zero Network