

July 7, 2021

The Honorable Maria Cantwell, Chair
The Honorable Roger Wicker, Ranking Member
Committee on Commerce, Science, and Transportation
United States Senate
Washington, D.C. 20510

Dear Chair Cantwell and Ranking Member Wicker:

As the multi-year surface transportation reauthorization bill, the “Surface Transportation Investment Act” (S. 2016), proceeds to the Senate Floor for consideration, we urge you to make important and needed improvements which prioritize safety on America’s roads and highways. Based on the highway death and injury toll these past few years, we can expect record numbers – over 183,000 people to be killed and nearly 14 million to be injured in motor vehicle crashes at a comprehensive cost of more than \$5 trillion over the next five years.

These figures are staggering but can be addressed with proven, cost-effective solutions. Advancing these changes and corrections requires the leadership of and commitment by this Committee. Your decisions will determine whether or not our country is put on the path toward significant reductions in motor vehicle crash fatalities and injuries for the next five years and beyond.

The mere inclusion of provisions in the bill which propose to study or consider proven and well-researched solutions instead of completing regulatory actions on urgently needed vehicle and traffic safety improvements will not result in serious and consequential policy changes, and most importantly essential safety gains. Studies are insufficient and inadequate substitutes for directives on standards especially when research, real-world crash experience and reports already demonstrate the proficiencies of technological solutions.¹ Moreover, the absence of a date certain for the issuance of a rule allows the process to drag on for years, if not decades or beyond.

Every major surface transportation law has included a robust bipartisan safety title from the Commerce, Science, and Transportation Committee to advance transformational solutions that reduce crashes, save lives, mitigate injuries, and curtail crash costs. Federal vehicle safety standards also address equity issues. Effective lifesaving technologies should not be available only to those who can afford expensive luxury add-ons that also include safety upgrades or high-end models equipped with advanced safety systems. It is incumbent upon this Committee to continue this progress by seeking improvements to the following issues:

- **Advanced Driver Assistance Systems (ADAS) including Automatic Emergency Braking (AEB) Should be Required in All New Cars and Trucks:** The Insurance

¹ Lives Saved by Vehicle Safety Technologies and Associated Federal Motor Vehicle Safety Standards, 1960 to 2012, DOT HS 812 069 (NHTSA, 2015); NTSB, 2021-2022 IIHS, Real-world benefits of crash avoidance technologies (May 2018); Teoh, E, Effectiveness of front crash prevention systems in reducing large truck crash rates, IIHS (Sep. 2020). Most Wanted List of Transportation Safety Improvements.

Institute for Highway Safety (IIHS) has shown that forward collision warning plus autobrake (automatic emergency braking, AEB) reduces front-to-rear crashes for cars by 50 percent and for large trucks by more than 40 percent. The National Transportation Safety Board (NTSB) has recommended repeatedly, including most recently in its 2021-2022 Most Wanted List of Transportation Safety Improvements, that AEB and other crash avoidance technologies should be standard equipment on *all* vehicles. Class 3-6 trucks travel on local streets and through neighborhoods everyday making millions of deliveries, picking up garbage, and delivering supplies to retail stores and other businesses. In fact, May 2021 sales in Class 6 soared 64.5 percent to 4,767 compared with a year earlier. Class 4-5 trucks had the largest numerical increase in sales, climbing from roughly 8,500 to nearly 11,500.² Equipping these trucks with AEB subject to minimum performance standards which ensure the system detects and responds to pedestrians, bicyclists and other vulnerable roads users (VRUs), will make neighborhood streets safer for all. This proven technology should be required by a date certain in all new cars and trucks. (*Changes needed to Sections 3010 and 4208*)

- **Passive Impaired Driving Prevention Systems Can Significantly Reduce Fatalities – About 1/3 of All Traffic Deaths:** The current provision must be strengthened by striking language that will result in an unnecessary delay in implementing this essential rulemaking. Additionally, language should be removed tying the impaired driving prevention technology to a .08 percent blood alcohol concentration (BAC). Numerous national and international organizations representing public health and medical professionals, government safety experts, and impaired driving victims strongly support a BAC limit of .05 percent or lower based on the scientific research. Additionally, Utah has enacted a .05 percent BAC limit, and other states are considering the same action. (*Changes needed to Section 4220*)
- **Distracted Driving is a Persistent but Solvable Problem:** Distracted driving fatalities increased by 10 percent in 2019, amounting to 3,142 people killed. This provision must be strengthened to require the installation of driver monitoring systems by a date certain to help prevent automation complacency as well as curb other leading crash causes including impaired and drowsy driving. (*Changes needed to Section 4209*)
- **Allowing Teen Truckers to Operate Large and Heavy Trucks in Interstate Commerce is Reckless:** Commercial motor vehicle (CMV) drivers under the age of 19 are four times more likely to be involved in fatal crashes, and CMV drivers between the ages of 19-20 are six times more likely to be involved in fatal crashes than all truck drivers. A thorough and extensive analysis by the Department of Labor found no evidence of a driver shortage. Driver retention, and not driver shortage, is the problem and will not be solved by allowing 3,000 teens to drive heavy trucks across state lines. According to industry data, driver turnover at some carriers is near 90 percent. In addition, states issue more than 450,000 new commercial driver licenses (CDLs) each year demonstrating that there are candidates able to fill vacancies. This provision should be stricken and replaced with the advancement of policies that will result in the industry

² May Medium-Duty Sales Climb 36% From 2020 period, Transport Topics, Jun. 16, 2021.

keeping drivers through improved safe working conditions. *(Cantwell 1 to Young 1 (modified) should be removed)*

- **Child Deaths in Hot Cars Can Be Prevented with Detection and Alert Systems:** Tragically, 1,000 children have died in hot cars since 1990. Inexpensive safety systems to end these incidents are currently available and should be required in all new passenger vehicles. These systems must be required to detect the presence of an occupant in the passenger compartment to ensure that children who access a vehicle on their own, as well as children who are unknowingly left in a vehicle, are saved. *(Changes needed to Blumenthal 1 (modified))*
- **A Deadline for Agency Action on Hood and Bumper Upgrades is Imperative to Save Lives:** This section directs the U.S. Department of Transportation (DOT) to examine potential updates to hood and bumper standards for motor vehicles to improve the safety of pedestrians, bicyclists and other VRUs. However, a deadline must be given to DOT to implement these critical improvements. Many other countries already have implemented hood and bumper design changes that are making their roads safer for all road users. *(Changes needed to Section 4214)*
- **50 Years is Too Long with Too Many Deaths to Continue Enduring a Failed and Deadly Seat Back Standard:** Children who are properly restrained in the rear seat of a vehicle are being needlessly killed when a seat back fails. The federal standard for seat backs has remained relatively unchanged since 1967. It must be required to be improved by a date certain to prevent any more senseless deaths. *(Changes needed to Section 4204)*
- **Keyless Ignition Systems Can Result in Deaths and Injuries:** People are being killed in preventable roll away crashes when they do not realize their vehicles with these systems are still turned on or not in park and they exit the vehicle. A final rule by a date certain to prevent car movement when the engine is on, the vehicle is not in park and the driver door is open must be required. *(Changes need to Section 4205)*
- **Solutions to Improve Consumer Protections Need Agency Action, Not More Studies:** Provisions involving vehicle safety recalls must include deadlines for DOT action instead of simply further examining this serious issue. In addition, the agency must be directed to complete a long overdue and comprehensive update of the New Car Assessment Program (NCAP) including protections for VRUs. *(Changes needed to Sections 4216 & 4217 and 4213)*
- **Close the “Used Car Loophole” and Achieve Safety Equity for Families Buying Used Cars:** In recent years, millions of motor vehicles have been recalled for serious and sometimes fatal safety defects such as those including GM ignition switches and Takata airbags. Nonetheless, used cars are still allowed to be sold, leased, and loaned with open recalls. In the FAST Act (Pub. L. 114-94), this Committee originated and advanced legislation that closed the deadly loophole on rental cars with recalls. It is past time that

this Committee offer the same protection for those who purchase used cars. *(The Used Car Safety Recall Repair Act (S. 1835) must be included)*

- **Truck Driver Fatigue is a Deadly Problem; Special Interest Exemptions from Federal Truck Driver Hours of Service (HOS) Limits Will Exacerbate, Not Solve It:** Truck crash deaths are climbing with nearly a 45 percent increase in the last 12 years, since the low in 2009. Despite this sobering statistic, efforts continue unabated in Congress to rollback critical truck safety rules. The NTSB has repeatedly cited fatigue as a major contributor to truck crashes. Even self-reports of fatigue, which almost always underestimate the problem, document that fatigue in truck operations is pervasive. Since the implementation of the electronic logging device (ELD) rule in December 2017, there have been constant and relentless attacks by segments of the trucking industry to undermine the rule by creating or expanding exemptions for drivers from the HOS or ELD rule. To be clear, the ELD rule did not change the HOS rules. Motor carrier operations that complied with the HOS rules before the ELD rule do not need any additional exemptions or changes to the HOS rules to comply with current regulations. *(Fischer 1 and Lee 76 should be removed)*. In addition, recent revisions to the HOS rules finalized in June 2021 dangerously weakened the HOS rules and should be rescinded. Lastly, all CMV operators should be properly screened and treated for obstructive sleep apnea which has been identified to cause fatigue in those afflicted with this serious medical condition.
- **Truck Underride Crashes are Gruesome and Deadly but Can be Stopped with Better Guards:** Side and front underride guards that can prevent and mitigate horrific crashes where a passenger vehicle travels underneath a CMV or trailer must be required, not just studied. *(Changes needed to Section 3011)*
- **Don't Hide Important Safety Data on Motor Carriers. The Public Has a Right to Know:** DOT must have the ability to provide proper oversight of unsafe motor carriers. All federal crash data must be available for public review and the process for assigning safety ratings to carriers must be enhanced. *(See Sec. 4202 of the INVEST in America Act, H.R. 3684)*
- **Overdue Safeguards are Needed to Protect Children Riding in School Buses:** Millions of families count on school buses every day to safely deliver their child to school. However, these vehicles lack basic safety systems recommended for years by the NTSB. Our most precious passengers deserve the utmost protection. Seat belts, crash avoidance technologies and modern fire suppression equipment must be required on all new school buses. *(Changes needed to Section 4110)*
- **Deadly Crashes Involving Limousines Exposed Serious Safety Lapses:** These vehicles lack essential standards creating dangerous gaps in safety which can cause a family's happiest moments to turn into their worst nightmare. The NTSB has identified several shortcomings that must be addressed. Limousines must be required to meet crashworthiness standards as well as be equipped with adequate occupant protections

including seat belts. In addition, the operators of these vehicles must be required to have a valid commercial driver's license. (*Changes needed to Section 3015*)

Thank you for your consideration of these critically important issues. In the surface transportation bill, the Senate Commerce, Science, and Transportation Committee has a unique opportunity to build upon its rich safety legacy. We strongly urge you to advance lifesaving vehicle safety standards, provide critical consumer information and achieve fundamental safety equity by addressing and acting to correct these serious and deadly omissions from S. 2016. We request that you to meet the moment by enacting into law safety measures that make significant and sustained reductions in highway deaths and injuries over the next five years. As always, we are ready to work with you to realize our shared goal of improving safety for all road users.

Sincerely,

Catherine Chase, President, Advocates for Highway and Auto Safety

Jason Levine, Executive Director, Center for Auto Safety

Joan Claybrook, Chair, Citizens for Reliable and Safe Highways

Jack Gillis, Executive Director, Consumer Federation of America

Rosemary Shahan, President, Consumers for Auto Reliability and Safety

Amy Cohen, Co-Founder, Families for Safe Streets

Natalie Draisin, North American Office & United Nations Representative, FIA Foundation

Janette Fennell, Founder and President, Kids and Car Safety

Bill Nesper, Executive Director, League of American Bicyclists

Melissa Wandall, President, National Coalition for Safer Roads

Sally Greenberg, Executive Director, National Consumers League

Daphne Izer, Co-Chair, Parents Against Tired Truckers (P.A.T.T.)

Russell Swift, Co-Chair, Parents Against Tired Truckers (P.A.T.T.)

Robert Weissman, President, Public Citizen

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

Andrew McGuire, Founder and Executive Director, Trauma Foundation

Dawn King, President, Truck Safety Coalition

Catherine DeSalvo (*New Jersey*)

Catherine's husband, Jim, was killed while riding his bike in 2019, when the tire flew off of an overweight, unmaintained dump truck and hit him.

Laura and Richard Fredricks (*New Jersey*)

Laura and Richard's daughter, Emily, was killed while riding her bicycle to work in 2017 when a sanitation truck turned in front of her.

Eileen Kosc (*Delaware*)

Eileen was driving home from the beach in slow traffic in 2013 with her sons, Brandon and Bryan, when she was struck from behind by an inattentive box truck driver who failed to slow down. The truck continued on to hit four other vehicles before coming to a stop. Eileen and Brandon were taken to the hospital with injuries. Bryan, who was seven years old, did not survive.

Catriona and Brad Moe (*Kansas*)

Brad was walking with his 3-year-old daughter, Isla, when they accepted a package from a delivery truck driver who was backed into the end of the driveway. They continued up their driveway when the driver backed up, killing Isla.

Purushottam & Mina K P Panthee (*New York*)

In 2020, Purushottam and Mina's 10-year-old son, Shree, was killed, and Mina has serious, life-threatening injuries, from a collision in a school cross walk with a Queens, NY, sanitation truck. In Purushottam's words: "It is not just the physical wounds but she (Mina), along with our whole family, is suffering from mental pain. We are a victim's family and want to request the U.S. government to impose more regulations for truck safety and pedestrian rights to save lives."

Jane Mathis, Vice President, Truck Safety Coalition & Board Member, P.A.T.T. (*Florida*)

Jane's 23-year-old son, David, and his bride, Mary Kathryn, were killed while on their way home from their honeymoon in 2004 when they were stopped in traffic and hit from behind by a semi whose driver fell asleep at the wheel. The car became wedged under the truck, then exploded.

Jennifer M. Tierney, Board Member, CRASH & Truck Safety Coalition. (*North Carolina*)

Jennifer's father, James Mooney, was killed on a dark, rural road in 1983 when he crashed into a truck with no visible lights blocking the roadway.

Tami Friedrich Trakh, Board Member, CRASH & Truck Safety Coalition. (*California*)

Tami's sister, Kris, brother-in-law, Alan, and two of their children, Brandie and Anthony, were killed in 1989 when a tanker truck overturned in front of them and exploded.

Pamela Biddle, Board Member, CRASH & Truck Safety Coalition (*Georgia*)

In 2017, Pamela's 23-year-old son, Aaron Lee, his father, Brian Lee, and Brian's partner, Stephanie Swaim, were killed when they were stopped in interstate highway traffic caused by a semi with a wheel fire and hit from behind by another semi which failed to slow. The semi driver also perished.

Larry and Patty Liberatore (*Maryland*)

Larry and Patty Liberatore's son, Nick, was killed in 1997 by a fatigued truck driver who drove his semi over their son's vehicle.

Nikki Hensley Weingartner, Board Member, P.A.T.T. & Truck Safety Coalition. (*Hawaii*)

Nikki's husband, Virgil Hensley, was killed in 1997 when a truck driver ran a stop sign at an intersection, killing him instantly.

Linda Wilburn, Board Member, P.A.T.T. & Truck Safety Coalition. (*Oklahoma*)

Linda and Gary Wilburn's son, Orbie, was killed in 2002 when a tired truck driver slammed into his car.

Nancy Meuleners (*Minnesota*)

Nancy was severely injured in 1989 when her vehicle slid under the back of a semi stopped in traffic without emergency flashers illuminated. She has had over 40 surgeries to reconstruct her face and mouth and expects there will be more.

Franklin Wood (*Virginia*)

Franklin's daughter, Dana, and her friend were killed in 2002 when a truck driver, driving on a suspended license, struck Dana's car, pushing it 1,500 feet down the highway.

Ed Slattery (*Maryland*)

Ed's wife, Susan, was killed, and his sons, Peter and Matthew, were severely injured in 2010 when they were rear-ended by a truck driver who fell asleep. Lifetime costs for Matthew's care alone are estimated to be \$35 – \$45 million. Ed's journey since the crash has been documented in the book, *The Long Blink, the true story of trauma, forgiveness, and one man's fight for safer roads*, by award-winning Baltimore reporter and author, Brian Kuebler.

Roy Crawford (*Kentucky*)

Roy's son, Guy Champ Crawford, was killed in 1994 by an overloaded coal truck that had poor conspicuity and no underride guards. Roy is a retired forensic engineer who has reconstructed many fatal truck crashes.

Gage Evans (*Colorado*)

In 2019, Gage's husband, Bill Bailey, was killed when a truck driver hauling a load of lumber was descending from the mountains on an interstate at a very high speed and crashed into the rear of slowing traffic in Lakewood, Colorado, killing 4 people and injuring many others. The motor carrier's limits of liability coverage (of either \$750k or \$1 million) was paid out to other claimants (including payments to other motor carriers for their property damage) before Gage even had time to hire a lawyer.

Rick Watts (*Virginia*)

In 2015, Rick's wife, Tiffany, his stepdaughters, Kelsie and Savannah, and Sandra Anderson, Tiffany's mother, were stopped near Chattanooga, TN, in traffic due to construction, when a tractor trailer collided with eight vehicles. Six people, including Rick's entire family, were killed, and another six people were injured. The NTSB investigated this horrific crash.

Kristi, Floyd, and Brandi Garrigues (*Washington*)

Kelsie and Savannah, from the 2015 Watts crash above, were Kristi and Floyd Garrigues' granddaughters and Brandy's nieces. They lost both of them that terrible day.

Dorine E. and Thomas S. Norko, Kaiya Manlapit-Norko (*Connecticut*)

In 2018, in Idaho, Dorine's son, Kaiya's brother, Senior Airman Lawrence P. Manlapit III, was killed along with two of his fellow airmen, Carlos Johnson and Karlie Westall, when the Jeep they were riding in was stopped in traffic in a construction zone and rear-ended by a tractor-trailer. The Jeep and truck were engulfed in flames. The semi driver, who had a poor record, was going 62 mph before impact, and was also killed.

Paula Tolliver (*Ohio*)

On December 7, 2018, Paula's granddaughter, Teresa Howell, was working on U.S. 33 replacing a guardrail when a semi driver veered off the road. Teresa was hit and killed. The driver did not stop, and when he was found, he stated he did not realize he had hit anything. The driver of this semi had killed another person in a similar crash less than six months prior. Teresa left behind two sons, ages five and six.

Marija and Tiana Ozolins, Mary Bakken (*Virginia*)

On October 2, 2019, Mary's husband, Marija and Tiana's father, Peter Ozolins, was slowing in traffic when a tractor trailer failed to respond and hit the line of traffic. Peter and one other person were killed.

Brenda Stotts-Young (*Kentucky*)

Brenda and Chuck are parents of Detective Deidre Mengedoht, who was killed as a first responder in December 2018 when a semi-truck hit her cruiser which was stopped on the side of I-64, sending her into the pickup truck she had pulled over due to traffic violations. Her cruiser burst into flames and Detective Mengedoht was killed.

Anna Guardipee (*Virginia*)

Anna and her dear friend, Jennifer Burton, were slowed in construction traffic in 2019 when a semi failed to stop and rear ended their vehicle, pushing them into another semi. Anna was paralyzed and Jennifer was killed.

Encl: Safety Spotlight

cc: Members of the U.S. Senate

Safety Spotlight: Recommendations for Floor Consideration - S. 2016

From Advocates for Highway and Auto Safety, American Public Health Association, Center for Auto Safety, Consumers for Auto Reliability and Safety, Citizens for Reliable and Safe Highways (CRASH), Consumer Federation of America, Families for Safe Streets, FIA Foundation, Kids and Car Safety, League of American Bicyclists, National Coalition For Safer Roads, National Consumers League, Parents Against Tired Truckers (P.A.T.T.), Public Citizen, Society For the Advancement of Violence and Injury Research, Trauma Foundation, Truck Safety Coalition, .05 Saves Lives Coalition

Essential Improvements Needed to Existing Provisions

Underlined issues are needed changes

Vehicle Safety Technology and Other Vital Improvements:

- Require proven crash avoidance technology in all new cars and trucks including class 3-6, add requirements to ensure the technology will detect and respond to pedestrians, bicyclists and other vulnerable roads users (VRUs), and add a date certain for compliance. (Sec. 3010 & Sec. 4208)
- Language to require passive impaired driving prevention technology was weakened in the manager's amendment with the addition of a report to Congress if a final rule isn't issued ten years after enactment. This provision would significantly hinder the ability to take legal recourse. This language must be stripped, and changes to the definition of the technology that tie it to .08% blood alcohol concentration (BAC), as opposed to state legal limits, must be made. This will have a chilling effect on .05% BAC efforts if it is not removed. Sen. Lee's amendment (#97, accepted) to strip the .08% BAC requirement from the technical section was a good first step. (Sec. 4220)
- Require driver monitoring systems by issuance of a final rule by a date certain to prevent automation complacency and curb leading crash causes including distracted, impaired and drowsy driving. (Sec. 4209)
- Require the seat back standard to be updated to prevent seat back failures and the resulting fatalities and injuries which are often sustained in a crash by children properly restrained in the backseat. (Sec. 4204)
- Add a date certain for requirements to improve hood and bumper standards to better protect bicyclists, pedestrians and other VRUs. (Sec. 4214)
- The "Hot Cars" provision needs a requirement for technology to detect unattended children and not limited to the back seat compartment in addition to alert systems to prevent hot car deaths and injuries of children and pets. (Sen. Blumenthal's amendment #1 was accepted but it was significantly compromised.)
- Keyless ignition section to prevent carbon monoxide poisoning was enhanced to add a provision on the roll-away issue but it is only a study; needs a requirement to address roll-aways. (Sec. 4205) (Sen. Blumenthal's amendment #2 was accepted but it was significantly compromised.)

Consumer Protections:

- Update safety databases and improve early warning reporting requirements with deadlines for action rather than study the issue. (Sec. 4216 & Sec. 4217)
- Require a comprehensive update of the New Car Assessment Program (NCAP) and ensure that it adequately addresses the safety of VRUs. (Sec. 4213)
- Missing: Provisions needed to prevent used vehicles with unrepaired safety recalls from being sold, leased or loaned.

Commercial Motor Vehicle (CMV) Safety Upgrades:

- Require side and front underride guards on trucks in addition to upgrading the rear guard standard. (Sec. 3011)
- Improve school bus safety by including requirements for seat belts, fire suppression and crash avoidance technologies, and curb school bus driver fatigue. (Sec. 4110)
- Improve limousine safety by requiring crashworthiness standards be met and upgrading occupant protection. (Sec. 3015)
- Missing: Provision needed to direct improvements to oversight of unsafe motor carriers by making all crash data available for public review and making carrier fitness ratings accurate.

Oppose

Exacerbation of Truck Driver Fatigue:

Actions to weaken or circumvent hours of service (HOS) rules and electronic logging device (ELD) requirements are a persistent, anti-safety objective of some members of the trucking industry. The National Transportation Safety Board (NTSB) has repeatedly cited fatigue as a major contributor to truck crashes and included reducing fatigue-related crashes on its Most Wanted List of Safety Changes. Actions must be taken to prevent, rather than worsen, this well-known and pervasive safety issue. The adopted amendment, Cantwell #1 to Fischer #1, was limited to livestock, rather than the broader inclusion of "agricultural products" in the bill. The adopted amendment, Lee #76, requires DOT to analyze the cost and effectiveness of ELDs which have already been shown to reduce driver violations of HOS rules. **Strip expansion of truck driver HOS exemption for livestock haulers (HAULS Act) and attack on ELDs.**

Permitting Teen Truckers to Drive Big Rigs in Interstate Commerce:

Younger CMV drivers, permitted to drive in some states for intrastate travel, have higher crash rates. In fact, CMV drivers under the age of 19 are four times more likely to be involved in fatal crashes and CMV drivers between the ages of 19 and 20 are six times more likely to be involved in fatal crashes. The public, as well as safety, public health and consumer groups, the International Brotherhood of Teamsters and OOIDA all oppose lowering the CDL age. Moreover, problems within the industry that create unsafe working conditions and truck driver retention issues remain unaddressed. Amendment Cantwell #1 to Young #1 created a three-year pilot program for an apprenticeship program allowing drivers aged 18, 19 and 20 to drive interstate. It allows for 3,000 apprentices. The amendment also includes a driver compensation study. **Strip teen trucker apprentice pilot program (DRIVE-Safe Act).**

Any Action to Increase, Circumvent or Provide Exemptions to Truck Size and Weight Limits or Axle Tolerances:

Bigger and heavier trucks endanger all motorists and disproportionately damage the infrastructure. Exemptions from federal truck size and weight limits severely diminish their effectiveness and compromise enforcement efforts. Any action to increase, circumvent or provide exemptions to truck size and weight limits or axle tolerances including state or industry carve-outs, pilot programs or other efforts should be rejected.

Any Changes to Further Weaken the Compliance, Safety, Accountability (CSA) Program:

The CSA program is designed to identify high risk motor carriers for intervention and improved compliance. Unfortunately, some of the CSA data has been removed from public view since 2015. The data should be restored rather than further weakening the program.

Mass Exemptions from Safety Standards for Deployment of Autonomous Vehicles (AV):

Expanding the number of AVs that can be SOLD to the public under 49 USC 30113 that do not meet critical federal safety standards, such as those that ensure occupant protection and crashworthiness, should not be permitted. Doing so will potentially unleash hundreds of thousands of vehicles equipped with technologies that are unproven and unregulated putting all road users at risk – both the occupants of the vehicles and other road users including bicyclists and pedestrians. Instead, commonsense safety regulations and oversight to ensure safe and equitable AV deployment should be advanced.

Efforts to Strike or Reduce Any Safety Provisions:

The National Highway Traffic Safety Administration (NHTSA) recently released 2020 preliminary estimates revealing 38,680 people were killed in motor vehicle crashes, marking the highest number of traffic fatalities since 2007 and a seven percent increase over 2019. The time for action is now and efforts to advance proven solutions should not be undercut or stricken.