



ADVOCATES  
FOR HIGHWAY  
& AUTO SAFETY

July 5, 2023

The Honorable Pete Buttigieg  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

Dear Secretary Buttigieg,

Speeding is a persistent and deadly issue on our roads. The National Highway Traffic Safety Administration (NHTSA) has identified speeding as one of “three major behavioral factors” that contributed to the dramatic spike in overall traffic fatalities from 2019 to 2020.<sup>i</sup> Twenty-nine percent of the 42,939 people killed in 2021, or 12,330 fatalities, were speeding related. These losses totaled an eight percent increase from 2020, which recorded a 19 percent increase from the previous year (2019).<sup>ii</sup> Proven solutions are critically needed to stop this leading killer. We commend you, NHTSA and the Federal Motor Carrier Safety Administration (FMCSA) for recently commencing rulemakings on automatic emergency braking (AEB) for new cars and trucks and urge you to similarly move forward with a rulemaking to require intelligent speed assistance (ISA) systems on new vehicles.

Under your leadership, the U.S. Department of Transportation (DOT) adopted the Safe System Approach (SSA) which identifies safer speeds as a key element to accomplish the goal of zero fatalities on our roads. Safer speeds can mitigate other traffic safety issues and reduce crashes. The Insurance Institute for Highway Safety (IIHS) study of speed limit reductions in Seattle, Washington, found a five miles-per-hour (mph) reduction in speed limits was associated with a 17 percent reduction in odds of a crash in the downtown area involving a police-reported injury. On arterial roads (high-capacity urban roads that are not freeways) in the downtown area, the speed limit reduction was associated with a 20 percent decrease in odds of a crash involving a police-reported injury.<sup>iii</sup>

The implications of speed on vulnerable road users (VRUs) – pedestrians, bicyclists, roadside first responders and other people outside of the vehicle – are even greater. The average risk of death for a pedestrian is 10 percent at an impact speed of 23 mph, 25 percent at 32 mph, and 50 percent at 42 mph.<sup>iv</sup> Pedestrians and cyclists continue to be killed on our roads at an alarming rate. Tragically, over 7,300 pedestrians died in vehicle crashes in 2021, a 13 percent increase over 2020, according to NHTSA.<sup>v</sup> In the same time period, almost 1,000 pedalcyclists died on U.S. roads. A total of 117,081 pedestrians and cyclists suffered injuries.<sup>vi</sup>

Another key element of the SSA is safer vehicles, and technology proven to prevent or mitigate crashes is necessary to improve vehicle safety. ISA is a vehicle-based technology that can preclude the vehicle from exceeding the speed limit and avert or mitigate crashes. Requiring ISA on all new vehicles would simultaneously address two key elements of the SSA by engendering safer speeds and safer vehicles. Advocates for Highway and Auto Safety (Advocates), the National Transportation Safety Board (NTSB) and many other public safety partners have repeatedly supported requiring speed curbing technology on vehicles and called for the U.S. DOT to take action to do so.

Until this critical step is taken, localities can address speed safety on their roads by equipping fleet vehicles with ISA. New York City's ISA pilot program is a ready example of this vital approach. In April 2023, Advocates partnered with America Walks, Families for Safe Streets, the League of American Bicyclists and others to launch the Safer Fleets Challenge to motivate localities to utilize ISA in their government-owned fleets.

A new report from the Governors Highway Safety Association (GHSA) finds that more than 7,500 pedestrians were killed by drivers last year, the highest number in more than 40 years, based on preliminary data.<sup>vii</sup> The high number of losses is shocking, and you are in the coveted position to be able to effectuate real change and save lives by advancing ISA. In the interim, local action by cities and towns to equip their fleet vehicles with this lifesaving technology should be supported to all extents possible by the U.S. DOT.

Sincerely,



Catherine Chase  
President

cc: Robin Hutcheson, Administrator, FMCSA  
Sophie Shulman, Deputy Administrator, NHTSA  
Ann Carlson, Chief Counsel, NHTSA

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<sup>i</sup> Overview of Motor Vehicle Crashes in 2020, NHTSA, Mar. 2022, DOT HS 813 266, available at <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813266>.

<sup>ii</sup> 2021 Overview

<sup>iii</sup> Effects of Lowering Speed Limits On Crash Severity in Seattle, Mar. 2023, IIHS. Available at <https://www.iihs.org/api/datastore/document/bibliography/2279>.

<sup>iv</sup> Impact Speed and a Pedestrian's Risk of Severe Injury or Death, AAA Foundation for Traffic Safety, Sep. 2011., available at <https://aaaafoundation.org/wp-content/uploads/2018/02/2011PedestrianRiskVsSpeedReport.pdf>

<sup>v</sup> Stewart, T. (2023, April). *Overview of motor vehicle traffic crashes in 2021* (Report No. DOT HS 813 435). National Highway Traffic Safety Administration.

<sup>vi</sup> Stewart, T. (2023, April). *Overview of motor vehicle traffic crashes in 2021* (Report No. DOT HS 813 435). National Highway Traffic Safety Administration.

<sup>vii</sup> GHSA, *Spotlight on Highway Safety, Pedestrian Traffic Fatalities by State*, June 2023. Available here: <https://www.ghsa.org/resources/Pedestrians23>