



ADVOCATES
FOR HIGHWAY
& AUTO SAFETY

June 4, 2024

The Honorable Tom Carper, Chair
The Honorable Shelley Moore Capito, Ranking Member
Committee on Environment and Public Works
United States Senate
Washington, D.C. 20510

Dear Chair Carper and Ranking Member Capito:

Thank you for holding tomorrow's hearing, "Oversight and Budget of the Federal Highway Administration." As deaths and injuries on our Nation's roads remain at historically high levels, we urge this Committee to advance proven solutions to prevent crashes and protect families. Advocates for Highway and Auto Safety (Advocates) respectfully requests this letter be included in the hearing record.

Our Nation's Roadways Are Dangerous, Disastrous and Deadly for All Road Users

In 2022, an average of 116 people were killed every day on roads in the U.S., totaling just over 42,500 fatalities.¹ An additional 2.38 million people were injured.² This represents a 29 percent increase in deaths in just a decade.³ Early projections for 2023 traffic fatalities remain at a similar level; nearly 41,000 people are estimated to have died that year.⁴

Approximately 7,522 pedestrians and 1,105 bicyclists were killed in 2022, representing a one percent and 13 percent increase respectively, from 2021.⁵ In 2022, 6,218 motorcyclists were killed, accounting for 15 percent of all traffic fatalities.⁶ This is the highest number of motorcyclists killed since at least 1975.⁷

Truck crashes continue to cause exceedingly high loss of life and injuries. In 2022, 5,936 people were killed and over 160,000 people were injured in crashes involving large trucks.⁸ Since 2009,

¹ Overview of Motor Vehicle Traffic Crashes in 2022, NHTSA, Apr. 2024, DOT HS 813 560. (Overview 2022).

² Overview 2022.

³ Traffic Safety Facts 2021: A Compilation of Motor Vehicle Crash Data, NHTSA, Dec. 2023, DOT HS 813 527, (Annual Report 2021); and Overview 2022; [comparing 2013 to 2022].

⁴ Traffic Safety Facts: Crash Stats, Early Estimate of Motor Vehicle Traffic Fatalities in 2023, NHTSA, Apr. 2024, DOT HS 813 561.

⁵ Overview 2022.

⁶ NHTSA, Motorcycle Safety, Overview, available at: <https://www.nhtsa.gov/road-safety/motorcycles#:~:text=Overview,killed%20since%20at%20least%201975>.

⁷ *Id.*

⁸ Overview of Motor Vehicle Traffic Crashes in 2021, NHTSA, Apr. 2023, DOT HS 813 435.

the number of fatalities in large truck crashes has increased by 76 percent.⁹ In that same timespan, the number of people injured in crashes involving large trucks increased by 117 percent.¹⁰ In fatal two-vehicle crashes between a large truck and a passenger motor vehicle, 97 percent of the fatalities were occupants of the passenger vehicle.¹¹

The financial impact of motor vehicle crashes on our economy and on our families is staggering. Conservatively, the annual economic cost of motor vehicle crashes is approximately \$340 billion (2019 dollars).¹² This means that every person living in the U.S. essentially pays an annual “crash tax” of over \$1,000. These crashes negatively impact businesses as well. According to the Network of Employers for Traffic Safety, the total cost of crashes to employers is more than \$72 billion (2019 dollars).¹³ Moreover, the total value of societal harm from motor vehicle crashes in 2019 was nearly \$1.4 trillion.¹⁴

Safety Advances in the Infrastructure Investment and Jobs Act (IIJA) Must be Implemented Comprehensively and with Expediency

We once again commend the Committee on Environment and Public Works for advancing commonsense safety solutions in the IIJA.¹⁵ While vehicle safety technology is not within the Committee’s jurisdiction, the Safe System Approach is incorporated in the IIJA and undertakes a holistic method to improve safety in the roadway environment including advancing safe vehicles as a core element. Vehicle safety technology and roadway infrastructure improvements proven to upgrade safety have great potential to complement each other and collaboratively save lives.

The IIJA authorizes safety upgrades to the Highway Safety Improvement Program (HSIP) that will help to protect vulnerable road users (VRUs) and provides robust funding for the Safe Streets and Roads For All (SS4A) program to provide direct access to localities and roadway improvements consistent with Complete Streets policy. These changes promote infrastructure features that calm traffic, separate different types of road users, reduce vehicle speeds, and prevent or mitigate harmful interactions among road users. Advocates supports enhancing HSIP to allow for funding of projects that can strengthen protections for VRUs, perpetuating and expanding access to SS4A funding opportunities, advancing Complete Streets measures and

⁹ Overview 2022 and Annual Report 2021. Note, the 76 percent figure represents the overall change in the number of fatalities in large truck involved crashes from 2009 to 2021. However, between 2015 and 2016 there was a change in data collection at U.S. DOT that could affect this calculation. From 2009 to 2015 the number of fatalities in truck-involved crashes increased by 21 percent, and between 2016 to 2022, it increased by 27 percent.

¹⁰ Overview 2022 and Annual Report 2021. Note, the 117 percent figure represents the overall change in the number of people injured in large truck involved crashes from 2009 to 2022. However, between 2015 and 2016 there was a change in data collection at U.S. DOT that could affect this calculation. From 2009 to 2015 the number of people injured in truck-involved crashes increased by 59 percent, and between 2016 to 2022, it increased by 19 percent.

¹¹ Insurance Institute for Highway Safety (IIHS), Large Trucks. See: <https://www.iihs.org/topics/fatality-statistics/detail/large-trucks>.

¹² The Economic and Societal Impact of Motor Vehicle Crashes, 2019, NHTSA, Dec. 2022, DOT HS 813 403. (Economic and Societal Impact 2019).

¹³ Network of Employers for Traffic Safety (NETS), The Cost of Motor Vehicle Crashes to Employers–2019, March 2021, prepared by Ted R. Miller and A. Scott McKnight, Pacific Institute for Research and Evaluation.

¹⁴ Economic and Societal Impact 2019.

¹⁵ Pub. L. 117-58 (2021).

ensuring that all communities across the Nation can take advantage of federal dollars to implement these innovative approaches to improving public safety on their roadways.

Additionally, the IIJA includes provisions requiring automatic emergency braking (AEB) for passenger motor vehicles and large trucks, among other vehicle safety improvements.¹⁶ According to the Insurance Institute for Highway Safety (IIHS), AEB has the capability to reduce car front-to-rear crashes with injuries by 56 percent and large truck front-to-rear crashes by 41 percent.¹⁷ In addition to saving lives and preventing injuries, the ripple effect of these crash reductions is wide-ranging, including less damage to infrastructure, less congestion caused by crashes, and less expenditure of first responder resources, among others. Advocates lauds NHTSA for recently issuing a final rule that requires passenger vehicles be equipped with an AEB system that detects pedestrians. However, it also sets an excessively long compliance period (five years) and did not include bicyclist, motorcycle rider and truck detection. These gaps must be filled to ensure the technology works as needed to optimize the safety impact. Moreover, the agency must promptly complete the rulemaking requiring AEB on heavy vehicles, as well as other required rules to save lives and meet the deadlines set by Congress.¹⁸

Automated Enforcement Improves Roadway Safety

Automated enforcement (AE), such as speed and red-light running safety cameras, is a verified deterrent against frequent crash contributors and has been identified by NHTSA, the Federal Highway Administration (FHWA), the National Transportation Safety Board (NTSB), Centers for Disease Control and Prevention (CDC), IIHS and others as an effective means to curb dangerous driving behavior.¹⁹ Moreover, the Congressional Research Service (CRS) has found that speed camera programs are effective in reducing speeding and/or crashes near cameras.²⁰ Additionally, for VRUs, such as pedestrians and bicyclists, small changes in speed can have a large impact on survivability. New crash tests performed by IIHS, the AAA Foundation for Traffic Safety, and Humanetics show that modest five to ten miles per hour (mph) increases in speed can have a severe impact on a driver's risk of injury or even death.²¹ Provisions in the IIJA correctly permit use of certain federal funds for AE programs in school and work zones. This allowance should be expanded to curb deadly driving on other roadways.

Advocates Supports Efforts to Alleviate the Truck Parking Shortage

Advocates recognizes that the lack of safe and convenient truck parking is an issue that merits federal action. However, simply dedicating more federal funding to building parking facilities likely will not solve the issue alone. Studies have demonstrated that the parking shortage is often most acute in areas of the country such as along the Interstate 95 corridor in the Northeast where building facilities for parking may not be realistic due to costs and scarcity of open land.²² As such, along with providing funding to address this issue, Advocates urges policymakers to examine additional remedies to address this problem such as use of existing dormant facilities.

¹⁶ Pub. L. 117-58 (2021).

¹⁷ IIHS, Real World Benefits of Crash Avoidance Technologies (Dec. 2020).

¹⁸ 89 FR 39686 (May 9, 2024).

¹⁹ IIHS, Topics, Red Light Running, available at: <https://www.iihs.org/topics/red-light-running#effectiveness-of-cameras>

²⁰ CRS, Safety Impact of Speed and Red Light Cameras, R46552 (Sep. 28, 2020).

²¹ IIHS, New crash tests show modest speed increases can have deadly consequences (Jan. 28, 2021).

²² Federal Highway Administration, Commercial Motor Vehicle Parking Shortage (May 2012).

Overweight Trucks Damage our Nation’s Crumbling Infrastructure

Federal limits on the weight and size of commercial motor vehicles (CMVs) are intended to protect truck drivers, the traveling public, and our Nation’s roads, bridges and other infrastructure components. Yet, provisions allowing larger and heavier trucks that violate or circumvent these federal laws to operate in certain states or for specific industries have often been tacked into must-pass bills to avoid public scrutiny including in legislation recently passed by the Senate to provide funding to the U.S. DOT.²³

According to the 2021 Infrastructure Report Card from the American Society of Civil Engineers (ASCE), America’s roads receive a grade of “D” and our bridges were given a “C.”²⁴ Nearly 40 percent of our 615,000 bridges in the National Bridge Inventory are 50 years or older, and one out of 11 is structurally deficient.²⁵ The ASCE notes, “Growing wear and tear on our nation’s roads have left 43% of our public roadways in poor or mediocre condition, a number that has remained stagnant over the past several years.”²⁶ The U.S. DOT Comprehensive Truck Size and Weight Study found that introducing double 33-foot trailer trucks, known as “Double 33s,” would be projected to result in 2,478 bridges requiring strengthening or replacement at an estimated one-time cost of \$1.1 billion.²⁷ This figure does not account for the additional, subsequent maintenance costs which will result from longer, heavier trucks. In fact, increasing the weight of a heavy truck by only 10 percent increases bridge damage by 33 percent.²⁸ Prior to the recent collapse of the Francis Scott Key bridge in Maryland, the FHWA estimated that the investment backlog for bridges, to address all cost-beneficial bridge needs, was \$123.1 billion.²⁹

Raising truck weight or size limits could result in an increased prevalence and severity of crashes. Longer trucks come with operational difficulties such as requiring more time to pass, having larger blind zones, crossing into adjacent lanes, swinging into opposing lanes on curves and turns, and taking a longer distance to adequately brake. In fact, double trailer trucks have an 11 percent higher fatal crash rate than single trailer trucks.³⁰ Overweight trucks also pose serious safety risk. Brake violations are a major reason for out-of-service violations.³¹ According to a North Carolina study by IIHS, trucks with out-of-service violations are 362 percent more likely

²³ Making appropriations for the Departments of Transportation, and Housing and Urban Development, and related agencies for the fiscal year ending September 30, 2024, and for other purposes, S. 2437, 118 Cong, § 1 (2023).

²⁴ 2021 Infrastructure Report Card – Bridges, American Society of Civil Engineers (ASCE); 2021 Infrastructure Report Card – Roads, ASCE.

²⁵ 2021 Infrastructure Report Card – Bridges (ASCE).

²⁶ 2021 Infrastructure Report Card, available here: <https://infrastructurereportcard.org/>

²⁷ Comprehensive Truck Size and Weight Limits Study: Bridge Structure Comparative Analysis Technical Report, FHWA, June 2015.

²⁸ Effect of Truck Weight on Bridge network Costs, NCHRP Report 495, National Cooperative Highway Research Program, 2003.

²⁹ 2015 Status of the Nation’s Highways, Bridges, and Transit: Conditions and Performance, Chapter 7, p. 7-34, FHWA, 2016.

³⁰ An Analysis of Truck Size and Weight: Phase I – Safety, Multimodal Transportation & Infrastructure Consortium, November 2013; Memorandum from J. Matthews, Rahall Appalachian Transportation Institute, Sep. 29, 2014.

³¹ Roadside Inspections, Vehicle Violations: All Trucks Roadside Inspections, Vehicle Violations (2019 – Calendar), FMCSA.

to be involved in a crash.³² This is also troubling considering that tractor-trailers moving at 60 miles per hour are required to stop in 310 feet – the length of a football field – once the brakes are applied.³³ Actual stopping distances are often much longer due to driver response time before braking and the common problem that truck brakes are often not in adequate working condition.

There is overwhelming opposition to any increases to truck size and weight limits. The public, local government officials, safety, consumer and public health groups, law enforcement, first responders, truck drivers and labor representatives, families of truck crash victims and survivors, and even Congress on a bipartisan level have all rejected attempts to increase truck size and weight. Also, the technical reports released in June 2015 from the U.S. DOT Comprehensive Truck Size and Weight Study concluded there is a “profound” lack of data from which to quantify the safety impact of larger or heavier trucks and consequently recommended that no changes in the relevant truck size and weight laws and regulations be considered until data limitations are overcome.³⁴

The IIJA is investing billions of dollars to improve and elevate the safety of our Nation’s roads and bridges. Any increase to federal truck size and weight limits will undermine this objective, worsen safety problems, and divert rail traffic from privately owned freight railroads onto our already overburdened public highways. Despite claims to the contrary, bigger trucks will not result in fewer trucks. Following every past increase to federal truck size and weight limits, the number of trucks on our roads has gone up. Since 1982, when Congress last increased the gross vehicle weight limit, truck registrations have more than doubled.³⁵ The U.S. DOT study also addressed this meritless assertion and found that any potential mileage efficiencies from the use of heavier trucks would be offset in just one year.³⁶

Unfortunately, several misguided measures introduced in this Congress would harm public safety and thus should not become law. These include: No Kill Switches in Cars Act (HR 6563); the MOVE Act (HR 7496); Safer Highways and Increased Performance for Interstate Trucking (SHIP IT) Act (H.R. 471); Ceasing Age-Based (CAB) Trucking Restrictions Act (H.R. 267); Deregulating Restrictions on Interstate Vehicles and Eighteen Wheelers (DRIVE) Act (H.R. 3039); Licensing Individual Commercial Exam-takers Now Safely and Efficiently (LICENSE) Act (S. 1649/ H.R. 3013); Safe Routes Act of 2023 (S. 1818 /H.R. 2493); and proposed 91,000 lb. pilot program for commercial trucks (HR 3372).

We urge this Committee to oppose any increases to federal truck size and weight limits, including pilot programs and state or industry specific exemptions, and measures to prevent use of proven vehicle safety technologies.

³² Teoh E, Carter D, Smith S and McCart A, Crash risk factors for interstate large trucks in North Carolina, Journal of Safety Research (2017).

³³ Code of Federal Regulations (CFR) Title 49 Part 571 Section 121: Standard No. 121 Air brake systems (FMVSS 121).

³⁴ Comprehensive Truck Size and Weight Limits Study, Federal Highway Administration (June 2015).

³⁵ 2017 Annual Report.

³⁶ Comprehensive Truck Size and Weight Limits Study, Federal Highway Administration (June 2015).

Experimental Autonomous Driving Technology Remains Unproven

Currently, automated driving system (ADS) technology, which includes autonomous vehicles (AV), is unregulated. These vehicles have been involved in numerous serious and deadly crashes, many of which have been subject to investigation by the National Transportation Safety Board (NTSB) and NHTSA. Recently, NHTSA has announced investigations of Tesla's Autopilot System, Ford's Blue Cruise and the autonomous vehicle operations of Waymo and Zoox.³⁷ Furthermore, according to data collected by NHTSA's Standing General Order (SGO) 2021-1 requiring manufacturers to report certain crashes involving vehicles equipped with automated driving systems (ADS) or SAE Level 2 ADAS, approximately 598 crashes have involved ADS and 1,444 have involved ADAS. These include 33 crashes resulting in a fatality.³⁸

In addition, several San Francisco transportation agencies submitted comments to the California Public Utilities Commission last year detailing numerous dangerous incidents involving AVs operating in the city.³⁹ These events include:

- Interfering with emergency response operations including 18 incidents documented by the San Francisco Fire Department in which AVs put firefighters and the public at risk.
- Making planned and unplanned stops in travel lanes that have interfered with transit service and blocked traffic.
- Intrusions into construction zones where City employees were working.
- Obstructions caused by AVs having to interpret and respond to human traffic control officers.
- Erratic driving.⁴⁰

What San Francisco has been experiencing must not be replicated across the Nation by continuing to allow for the proliferation of AVs that do not comply with any federal safety regulations setting minimum performance standards for the driverless technology and related systems. Many promises have been touted about AVs bringing reductions in motor vehicle crashes and resultant deaths and injuries, lowering traffic congestion and vehicle emissions, expanding mobility and accessibility, improving efficiency, and creating more equitable transportation options and opportunities. However, as Transportation Secretary Buttigieg and others within the auto industry have acknowledged, these outcomes are far from certain.⁴¹

³⁷ Tom Krisher, *US probes whether Tesla Autopilot recall did enough to make sure drivers pay attention*, AP Apr. 26, 2024). Natalie Neysa Alund, Mike Snider, *Feds open preliminary investigation into Ford's hands-free driving tech BlueCruise*, USA Today (Apr. 29, 2024); Peter Valdes-Dapena, *Waymo and Zoox are under federal investigation as self-driving cars allegedly behave erratically*, CNN (May, 14, 2024).

³⁸ Totals by severity.

³⁹ San Francisco Comments to the Draft Resolution Approving Authorization for Waymo Autonomous Vehicle Passenger Service Phase I Driverless Deployment Program, R.12-12-011 (May 31, 2023). Available at: <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://sfstandard.com/wp-content/uploads/2023/06/SF-Comments-on-Waymo.pdf>.

⁴⁰ *Id.* at pgs. 9-11.

⁴¹ Nilay Patel and Andrew J. Hawkins, *Pete Buttigieg is Racing to Keep Up with Self Driving Cars*. The Verge (Jan. 6, 2022); Rebecca Fannin, *Where the billions spent on autonomous vehicles by U.S. and Chinese giants is heading*, CNBC (May 23, 2022).

Secretary Buttigieg also noted that AVs need to be held to a higher standard, “The standard should be, don’t just be as good as a human driver. Be much, much better.”⁴²

Supporters of AVs often assert that these vehicles will improve roadway safety by inaccurately stating that 94 percent of crashes are due to human error pointing to a report from NHTSA as support for this misleading claim. However, the agency stated in the same document with this statistic that “[a]lthough the critical reason is an important part of the description of events leading up to the crash, **it is not intended to be interpreted as the cause of the crash nor as the assignment of the fault to the driver, vehicle, or environment** (*emphasis added*).”⁴³ In addition, NTSB Chair Jennifer Homendy has declared that using the statistic in such a manner is “dangerous” and “[a]t the same time it relieves everybody else of responsibility they have for improving safety, including DOT.”⁴⁴ Proponents of AVs also have made the claim that these vehicles will prevent 90 percent of crash fatalities.⁴⁵ Yet, there is no credible research cited supporting such an assertion.

In sharp contrast to what is happening in the U.S., other countries are taking a more calculated, careful, and cautious approach to the development of AVs.⁴⁶ Often-repeated claims about the U.S. “falling behind” other countries in the “race” for AVs are simply not true nor supported by research. For example:

- China continues to require permits or restricts operations of AVs on its roads to only those areas approved by the authorities.⁴⁷
- Germany continues to require permits, approvals, and limits areas of operation for AVs.⁴⁸
- In Japan, the introduction of Level 4 vehicles is controlled and limited to specific areas, operations, and oversight.⁴⁹
- The latest United Nations Economic Commission for Europe (UNECE) regulations limit operations to restrict risks and oversee approval through testing and other requirements.⁵⁰
- According to the most recent KPMG analysis, the U.S. ranks fourth in the world for AV readiness, while China stands at number twenty.⁵¹

⁴² Keith Laing, Bloomberg News, “Pete Buttigieg Says Robotaxis Must Become Safer Drivers Than Humans,” May 16, 2024.

⁴³ Singh, S. (2015, February). Critical reasons for crashes investigated in the National Motor Vehicle Crash Causation Survey. (Traffic Safety Facts Crash Stats. Report No. DOT HS 812 115). Washington, DC: National Highway Traffic Safety Administration.

⁴⁴ Hope Yen and Tom Krisher, NTSB chief to fed agency: Stop using misleading statistics, Associated Press (Jan. 18, 2022).

⁴⁵ Iyad Rahwan and Azim Shariff, Self-Driving Cars Could Save Many Lives. But Mental Roadblocks Stand in the Way. Wall Street Journal (Apr. 6, 2021).

⁴⁶ Autonomous vehicles: cross jurisdictional regulatory perspectives update, Oct. 7, 2022.

⁴⁷ China drafts rules on use of self-driving vehicles for public transport; Aug. 8, 2022, Reuters; and Baidue bags China’s first fully driverless robotaxi licenses, Aug. 7, 2022, Reuters. Real driverless cars are now legal in Shenzhen, China’s tech hub, Jul. 25, 2022, TechCrunch+.

⁴⁸ Germany completes legal framework for autonomous driving | Federal Cabinet approves new ordinance, Apr. 2022, Malterer, M.

⁴⁹ Japan to open roads to autonomous vehicles in 2023, Nov. 28, 2022, Wessling, B., The Robot Report.

⁵⁰ New rules to improve road safety and enable fully driverless vehicles in the EU, Jul. 6, 2022, UNECE.

⁵¹ 2020 Autonomous Vehicles Readiness Index, KPMG, 2020, available at <https://assets.kpmg.com/content/dam/kpmg/xx/pdf/2020/07/2020-autonomous-vehicles-readiness-index.pdf>

In sum, no country is selling fully automated vehicles for unfettered use to the public, and by many accounts, none will be for a significant amount of time.⁵² The U.S. is not lagging other countries in allowing AVs to go to market, but we are behind in establishing comprehensive regulations to ensure public safety will not be jeopardized or diminished.

Considering the current inadequate performance of partial automation and fully autonomous technologies, it is unsurprising that the public has significant concerns. In February 2023, Advocates commissioned a public opinion poll which found that 83 percent of respondents were concerned with sharing the road with driverless cars. This number increased to 86 percent of respondents regarding driverless trucks.⁵³ Yet, 64 percent of respondents indicated that their concerns would be addressed if the vehicles were required to meet minimum government standards.⁵⁴

Autonomous Driving Technology Policy: Protecting Public Safety Must be First and Foremost

Currently, AVs are being tested throughout the country, and companies are collecting data on their performance every day. AVs used solely for testing do not have to comply with current FMVSS, including those that provide occupant protection.⁵⁵ Additionally, companies already can apply for exemptions from FMVSS.⁵⁶

Any federal legislation that is advanced by Congress likely will set AV policy for decades to come and must include minimum standards to improve safety on our Nation's roads before these vehicles are sold in the marketplace. In the meantime, it is essential that NHTSA continues to collect and evaluate the data obtained through the SGO involving these technologies, as well as improve the reporting requirements in the SGO as enumerated in letters from members of Congress to the U.S. DOT.⁵⁷

Additionally, state and local regulatory action on AVs, even though the federal government has not taken regulatory action, must not be prohibited. As the incidents noted above in San Francisco demonstrate, fundamental and commonsense safeguards must be instituted for testing on public roads including the establishment of independent institutional review boards to certify the safety of the protocols and procedures for testing of AVs on public roads.

To identify a people-and-safety-first path forward on AVs, Advocates and numerous stakeholders developed the "[AV Tenets](#)." These sound and sensible policy positions should be a foundational part of any national AV policy. The AV Tenets are based on expert analysis, real-world experience, and public opinion. They have four main categories including: 1) prioritizing safety of all road users; 2) guaranteeing accessibility and equity; 3) preserving consumer and

⁵² Lawrence Ulrich, Driverless Still a Long Way From Humanless, N.Y. Times (Jun. 20, 2019); Level 5 possible but "way in the future", says VW-Ford AV boss, Motoring (Jun. 29, 2019).

⁵³ ENGINE'S CARAVAN SURVEY, Public Concern About Driverless Cars and Trucks (Feb. 2023).

⁵⁴ *Id.*

⁵⁵ 49 USC 30112(b)(10).

⁵⁶ 49 CFR 555.

⁵⁷ Letter from Reps. Schakowsky, Castor and Trahan to NHTSA Acting Administrator Ann Carlson (Feb. 28, 2023); Letter from Reps. Mullin, Eshoo, Pelosi, Diaz Barragán, Lee, DeSaulnier, Carson, Doggett, Peters and Carbajal to NHTSA Deputy Administrator Sophie Shulman (Apr. 11, 2024).

worker rights; and, 4) ensuring local control and sustainable transportation. They are supported by a coalition of more than 65 organizations representing consumers, public health and safety experts, pedestrians, bicyclists, disability rights activists, emergency responders, law enforcement, labor and others. Requiring that AVs meet minimum performance standards, including for cyber security, and that operations are subject to adequate oversight, including a comprehensive database accessible by vehicle identification number (VIN) with basic safety information, are fundamental prerequisites and will save lives and boost consumer confidence in this burgeoning technology.

Comprehensive Safety Solutions Must be Advanced

Several bills introduced in this Congress would help address the unacceptable death and injury toll on our Nation's roads and should be enacted without delay. These include: Booster Seat Safety Act (H.R. 607); Complete Streets Act (S. 3670/ H.R. 7082); DOT Victim and Survivor Advocate Act; End DWI Act (H.R. 8213); Mail Traffic Deaths Reporting Act (HR 7527); Pedestrian Hazard, Awareness and Safety Expansion (PHASE) Act (HR 6111); Save Our Pedestrians Act of 2024 (H.R. 7191); School Bus Safety Act (S. 2746); Shielding All Federal Employees and Consumers from Actionable Recall Situations (SAFE CARS) Act (H.R. 799); Used Car Safety Recall and Repair Act (S. 4053); and, She Develops Regulations In Vehicle Equality and Safety (She DRIVES) Act.

Congress can take additional actions to address the public safety crisis on our Nation's roads. These include expanding access and funding for roadway planning, design, maintenance and building consistent with SSA and Complete Streets policy and directing NHTSA to require vehicle safety technologies including blind spot detection (BSD), intelligent speed assistance (ISA), rear AEB with cross traffic alert on all new vehicles, and antilock braking systems (ABS) on motorcycles. Further, drugged impaired driving poses a significant threat to roadway users. Establishing verified roadside testing technology, accelerating research to determine a causal link and a standard for cannabis impaired driving, and substantial funding for law enforcement training can help to address this deeply concerning and growing issue.

Thank you again for convening this hearing and for your consideration of these issues including those which may exceed the jurisdiction of the Committee but are critical to a comprehensive and effective solution. We look forward to working with you to improve safety for all road users on our Nation's roadways.

Sincerely,



Catherine Chase, President

cc: Members of the U.S. Senate Committee on Environment and Public Works