

July 23, 2024

Sophie Shulman
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Dear Deputy Administrator Shulman:

The undersigned support the final rule issued by the National Highway Traffic Safety Administration (NHTSA) to require automatic emergency braking (AEB) with pedestrian detection on light vehicles.ⁱ

According to NHTSA, requiring AEB on light vehicles will save hundreds of lives and prevent thousands of injuries annually at a time when the carnage and expense borne from crashes on our roadways are at historic highs. On average, 116 people were killed every day on roads in the U.S. in 2022, totaling just over 42,500 fatalities.ⁱⁱ An additional 2.38 million people were injured.ⁱⁱⁱ This represents a 29 percent increase in deaths in just a decade.^{iv} Early projections for 2023 traffic fatalities remain at a similar level.^v

This rule is the most impactful regulation for roadway safety issued by NHTSA in years. The effectiveness of AEB is indisputable. In fact, the Insurance Institute for Highway Safety (IIHS) has found that these safety systems have the capability to reduce car front-to-rear crashes with injuries by 56 percent.^{vi} Moreover, this technology is already available in many vehicles, and the rule provides a lengthy compliance period of five years.

Congress required NHTSA to promulgate this regulation in the bipartisan Infrastructure Investment and Jobs Act enacted in 2021.^{vii} In response, the agency engaged in a thorough and thoughtful multi-year rulemaking that resulted in a Federal Motor Vehicle Safety Standard that meets all statutory commands. This regulation should be implemented without delay, or preventable crashes will occur, and people will needlessly be killed or injured on our nation's roadways. As such, we urge NHTSA to deny in its entirety the petition for reconsideration of the final rule recently filed by the Alliance for Automotive Innovation.^{viii}

Sincerely,

Advocates for Highway and Auto Safety
Allstate Insurance Company
American Family Insurance
American Public Health Association
America Walks
Amica Mutual Insurance Company
Center for Auto Safety
Citizens for Reliable and Safe Highways
Consumer Federation of America
Consumers for Auto Reliability and Safety
Emergency Nurses Association

Families for Safe Streets
Farmers Insurance
FIA Foundation
Independent Insurance Agents & Brokers of America
Kids and Car Safety
League of American Bicyclists
Liberty Mutual Insurance
Mothers Against Drunk Driving
National Association of City Transportation Officials
National Association of Mutual Insurance Companies
National Coalition For Safer Roads
National Safety Council
Nationwide Mutual Insurance Company
NJM Insurance Group
Parents Against Tired Truckers
Selective Insurance Company of America
Society for the Advancement of Violence & Injury Research
Towing and Recovery Association of America
Transportation for America
Trauma Foundation
Truck Safety Coalition
Vision Zero Network
Whirlwind Wheelchair International

ⁱ 89 FR 39686 (May 9, 2024).

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

ⁱⁱⁱ Overview 2022.

^{iv} 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].

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

^{vi} IIHS, Real World Benefits of Crash Avoidance Technologies (Dec. 2020).

^{vii} Pub. L. 117-58, § 24208 (2021).

^{viii} Document ID: NHTSA-2023-0021-1071.