



ADVOCATES  
FOR HIGHWAY  
& AUTO SAFETY

November 12, 2024

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

Dear Secretary Buttigieg:

As we approach the third anniversary of the enactment of the bipartisan Infrastructure Investment and Jobs Act (IIJA, Pub. L. 117-58), which was enacted on November 15, 2021, Advocates for Highway and Auto Safety (Advocates) urges the U.S. Department of Transportation (DOT) to issue comprehensive vehicle safety standards before the end of the year to help reduce the needless and tragic fatality and injury toll on our Nation's roads.

Since the IIJA was debated in Congress and signed into law by President Biden, an estimated nearly 145,000 people have died and more than 5 million were injured on our roads and highways.<sup>1</sup> In just a decade annual highway deaths have increased 25 percent.<sup>2</sup> Early projections for 2024 show traffic fatalities still remain historically high.<sup>3</sup> Specific categories of road users continued to experience steep increases in deaths. For example, pedestrian fatalities increased 17 percent, bicyclist deaths were up 34 percent, and motorcyclist fatalities rose 26 percent from 2019 (pre-pandemic) to 2023 (latest year of available data by person type).<sup>4</sup> The IIJA includes a number of remedies to address these known problems.

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).<sup>5</sup> This means that every person living in the U.S. essentially pays an annual "crash tax" of over \$1,000. Adjusted for inflation only, the total economic cost for crashes would be \$416.6 billion today. Moreover, the total value of societal harm from motor vehicle crashes in 2019 was nearly \$1.4 trillion; accounting for inflation alone this cost would equate to \$1.72 trillion in 2024.<sup>6</sup>

Requiring safety technologies that meet minimum performance standards has been shown to be effective in saving lives and saving money.<sup>7</sup> For example, the National Highway Traffic Safety Administration (NHTSA) has estimated that between 1960 and 2012, over 600,000 lives have been saved by motor vehicle safety technologies.<sup>8</sup>

The IIJA required U.S. DOT to issue several Federal Motor Vehicle Safety Standards (FMVSS) that are essential to improving public safety with proven and cost-effective technologies. The unfulfilled requirements include automatic emergency braking (AEB) on heavy vehicles, advanced drunk and impaired driving prevention technology, and systems to protect children from horrific “hot car” deaths, among others.<sup>9</sup> To achieve the needed safety benefits and meaningfully reduce these targeted safety problems, comprehensive standards, some of which must exceed the directives in the law, must be issued.

We urge you to ensure that the U.S. DOT under your leadership implements all these directives. Delayed and deferred rulemakings will deny families the protection they need and deserve.

Sincerely,



Cathy Chase  
President

cc: Sophie Shulman, Deputy Administrator, NHTSA  
Vinn White, Deputy Administrator, Federal Motor Carrier Safety Administration (FMCSA)

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- <sup>1</sup> Traffic Safety Facts: Research Note, Overview of Motor Vehicle Traffic Crashes in 2022, NHTSA, Jun. 2024, DOT HS 813 560; Traffic Safety Facts: Crash Stats, Early Estimates of Motor Vehicle Traffic Fatalities in 2023, NHTSA, Apr. 2024, DOT HS 813 561; Traffic Safety Facts: Crash Stats, Early Estimates of Motor Vehicle Traffic Fatalities for the First Half (January – June) of 2024, NHTSA, Sept. 2024, DOT HS 813 633; [Fatalities from 2021-Jun. 2024, Injured from 2021 – 2022].
  - <sup>2</sup> Traffic Safety Facts 2021: A Compilation of Motor Vehicle Crash Data, NHTSA, Dec. 2023, DOT HS 813 527; Traffic Safety Facts: Crash Stats: Early Estimate of Motor Vehicle Traffic Fatalities in 2023, NHTSA, Apr. 2024, DOT HS 813 561; [comparing 2014 to 2023].
  - <sup>3</sup> Traffic Safety Facts: Crash Stats: Early Estimate of Motor Vehicle Traffic Fatalities For The First Half (January – June) of 2024, NHTSA, Sep. 2024, DOT HS 813 633.
  - <sup>4</sup> Traffic Safety Facts: Crash Stats, Early Estimates of Motor Vehicle Traffic Fatalities and Fatality Rate by Sub-Categories in 2023, NHTSA, May 2024, DOT HS 813 581; Traffic Safety Facts 2021: A Compilation of Motor Vehicle Crash Data, NHTSA, Dec. 2023, DOT HS 813 527.
  - <sup>5</sup> The Economic and Societal Impact of Motor Vehicle Crashes, 2019, NHTSA, Dec. 2022, DOT HS 813 403. (Economic and Societal Impact 2019).
  - <sup>6</sup> Economic and Societal Impact 2019.
  - <sup>7</sup> Cost Per Life Saved by the Federal Motor Vehicle Safety Standards, Dec. 2004, DOT HS 809 835.
  - <sup>8</sup> Lives Saved by Vehicle Safety Technologies and Associated Federal Motor Vehicle Safety Standards, 1960 to 2012, DOT HS 812 069 (NHTSA, 2015); See also, NHTSA AV Policy, Executive Summary, p. 5 endnote 1. Note: NHTSA should update this data.
  - <sup>9</sup> Pub. L. 117-58 (2021); § 24208 (Light Vehicle AEB); § 23010 Due: Nov. 2023 (Heavy Vehicle AEB); § 24220 Due: Nov. 2024 (Advanced Impaired Driving Technology); § 24222, Due Nov. 2023 (Rear Designated Seating Position Alert (Hot Cars)).