



ADVOCATES
FOR HIGHWAY
& AUTO SAFETY

January 14, 2025

The Honorable Sam Graves, Chair
The Honorable Rick Larsen, Ranking Member
Committee on Transportation and Infrastructure
United States House of Representatives
Washington, D.C. 20515

Dear Chair Graves and Ranking Member Larsen:

Thank you for convening the January 15, 2025, hearing, “*America Builds: The State of the Nation’s Transportation System.*” A successful transportation system must ensure the safety of the public on our nation’s roadways. Advocates for Highway and Auto Safety (Advocates) respectfully requests this letter be included in the hearing record.

Roadway Safety Requires Swift Intervention

On average, 116 people were killed every day on roads in the U.S., totaling just over 42,500 fatalities in 2022.ⁱ An additional 2.38 million people were injured.ⁱⁱ This is a 26 percent increase in deaths in just a decade.ⁱⁱⁱ Early projections for 2023 traffic fatalities remain at a similar historic high level; nearly 41,000 people are estimated to have died that year.^{iv}

Road users lacking the protection of vehicles (vulnerable road users, VRUs) continue to experience upturns in deaths. In 2022, 7,522 pedestrians and 1,105 bicyclists were killed, representing a 56 percent and 50 percent increase respectively in the past decade.^v While early traffic fatality estimates for 2023 demonstrate a two percent reduction in pedestrian fatalities, bicyclist fatalities rose again by four percent.^{vi} Furthermore, in 2022, motorcycle riders experienced the highest fatality total in a single year since data collection began in 1975; 6,218 motorcycle riders were killed.^{vii} Early estimates for 2023 indicate another two percent increase in motorcycle rider fatalities.^{viii}

In addition to the high physical and emotional toll of motor vehicle crashes, the annual economic cost is approximately \$340 billion (2019 dollars).^{ix} This figure equates to every person living in the U.S. essentially paying an annual “crash tax” of over \$1,000. Moreover, the total value of societal harm from motor vehicle crashes in 2019, which includes loss of life, pain and decreased quality of life, was nearly \$1.4 trillion.^x According to the Network of Employers for Traffic Safety (NETS), motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.^{xi}

Truck Crash Fatalities and Injuries are Alarmingly High and Extremely Costly

In 2022, 5,936 people were killed and over 160,000 people were injured in crashes involving large trucks.^{xii} Since 2009, the number of fatalities in large truck crashes has increased by 76

percent.^{xiii} In that same timespan, the number of people injured in crashes involving large trucks increased by 117 percent.^{xiv} In fatal two-vehicle crashes between a large truck and a passenger motor vehicle, 96 percent of the fatalities were occupants of the passenger vehicle.^{xv} The cost to society from crashes involving large trucks and buses was estimated to be \$128 billion in 2021, the latest year for which data is available.^{xvi} When adjusted solely for inflation, this figure amounts to over \$151 billion.^{xvii}

Prompt Implementation of Safety Improvements is Critical

Commonsense solutions were advanced by the Committee and Congress during consideration of the Infrastructure Investment and Jobs Act (IIJA).^{xviii} The law incorporates the Safe System Approach which undertakes a holistic method to improve safety in the roadway environment. In addition, the IIJA authorizes safety upgrades to the Highway Safety Improvement Program (HSIP) which will help to protect all road users and prevent crashes. The ripple effect of crash reductions is wide-ranging and includes less damage to infrastructure, less congestion caused by crashes and less expenditure of first responder resources, among others. Additional vital provisions to improve safety on our nation's roads were advanced including those to address impaired driving, improve the safety of vulnerable road users, expand the Safe Routes to School program and mitigate underride crashes. While traffic fatalities remain at historically high levels, the National Highway Traffic Safety Administration (NHTSA) recently announced that they decreased for 10 consecutive quarters, a hopeful change after multiple steep increases.^{xix} These safety efforts must be sustained to ensure the fatality decreases continue.

Weakening Essential Safety Regulations is Irreconcilable with Roadway Safety

Issues involving the nation's supply chain have not been properly addressed for decades and should not be worsened by rolling back safety policies. We urge the Committee to reject the following proposals that fail to address the root of these issues and will jeopardize all road users.

Public safety should not be threatened by "teen truckers." Commercial motor vehicle (CMV) drivers under the age of 19 are four times more likely to be involved in fatal crashes, as compared to CMV drivers who are 21 years of age and older, and CMV drivers ages 19-20 are six times more likely to be involved in fatal crashes (compared to CMV drivers 21 years and older).^{xx} Yet, some segments of the trucking industry have been pushing to allow teenagers to operate CMVs in interstate commerce for more than 20 years, often relying on their own forecasts for the number of drivers needed as a rationale. These projections have consistently failed to materialize.^{xxi} The trucking industry continues to face a driver retention crisis, not a driver shortage. Past witnesses from the trucking industry have testified during hearings before the Committee that there is not a driver shortage and perpetuating this falsehood could negatively affect the supply chain.^{xxii}

Driver fatigue is a known and persistent issue in the trucking industry. Self-reports of fatigue, which almost always underestimate the problem, find that fatigue in truck operations is a significant issue. In a 2006 driver survey prepared for FMCSA, "65 percent [of drivers] reported that they often or sometimes felt drowsy while driving" and almost half (47.6 percent) of drivers said they had fallen asleep while driving in the previous year.^{xxiii} In fact, the National Transportation Safety Board (NTSB) has repeatedly cited fatigue as a major contributor to truck crashes as determined by its investigations.^{xxiv} Expanding the hours truck drivers can drive or

undermining use of electronic logging devices (ELDs) to track driving hours as a rationale for moving more goods puts truck drivers, their loads and everyone on the roads with them at risk.

Overweight trucks threaten public safety and disproportionately damage America's infrastructure. Certain special interests have repeatedly advocated to suspend federal limits on the weight and size of CMVs in response to purported supply chain issues. Such requests should not be granted as these laws are essential to protecting truck drivers, the traveling public and our nation's roads and bridges. Raising truck weight or size limits could result in an increased prevalence and severity of crashes and cause increased wear and damage to our roadway infrastructure and bridges. Given the negative impacts, it is not surprising 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. The investments as a result of the IIJA are making improvements across every state in our nation to elevate the safety of our roads and bridges and support efficiency. These improvements should not be undercut by allowing bigger or heavier trucks.

Automated driving system (ADS) technology is not a solution to the current supply chain issues. While ADS may reduce crashes involving CMVs in the future, safe deployment on our nation's roads now is not a viable option. Autonomous driving technology has made advances yet remains unable to consistently operate safely with all road users, conditions and scenarios, as evidenced by fatal and serious crashes involving passenger motor vehicles equipped with ADS of varying levels.^{xxv} Transparency and robustness in crash and incident data reporting involving vehicles equipped with ADS are critical to the safety of public roads, the management of cities in which they are operating, for researchers and related industries as well as for Congress and the U.S. Department of Transportation (DOT) as it considers legislative and regulatory proposals. Further, if those incidents had involved autonomous commercial motor vehicles (ACMVs), which are larger and heavier with more stopping distance needed, the results could have been even more catastrophic, and the death and injury toll could have been much worse. Some of the most pressing safety shortcomings associated with autonomous vehicle (AV) technology, which include the ADS properly detecting and reacting to all other road users, driver engagement and cybersecurity, are exponentially amplified by the greater crash force of an ACMV. As such, it is imperative that ACMVs be subject to comprehensive safety regulations, including having a licensed driver behind the wheel for the foreseeable future.

The interest in expanding the use of this technology must not be used as a pretext to eviscerate essential safety regulations administered by the Federal Motor Carrier Safety Administration (FMCSA), and particularly in the absence of new standards to ensure the technology performs safely and as needed. The public safety protections provided by the Federal Motor Carrier Safety Regulations (FMCSRs) have become no less important or applicable simply because a CMV has been equipped with an ADS. In fact, there are additional substantial public safety concerns presented by ACMVs.

Advocates and numerous stakeholders developed the "AV Tenets," policy positions which should be foundational to any AV legislation.^{xxvi} The AV Tenets have four main, commonsense

categories including: 1) prioritizing safety of all road users; 2) guaranteeing accessibility and equity; 3) preserving consumer and worker rights; and, 4) ensuring local control and sustainable transportation. While the AV Tenets were developed for application to vehicles under 10,000 pounds, many of the principles also could apply to larger commercial vehicles. At a minimum, ACMVs must meet safety standards for the ADS and related systems, including for cybersecurity, and operations must be subject to adequate oversight as a starting point for their potential deployment.

In December 2024, Advocates released a public opinion poll that found 9 of 10 adults surveyed are concerned about themselves or their loved ones getting into motor vehicle crashes.^{xxvii} The survey noted that 88 percent of respondents affirmed sharing the roads with driverless trucks presented concern, with 69 percent acknowledging a high level of concern.^{xxviii} The high percentage expressing concern was regardless of political affiliation or region.^{xxix}

This Committee and Congress advanced a comprehensive and meaningful set of actions to improve safety in the most recent surface transportation reauthorization law. The DOT must implement the directives to address the motor vehicle crash fatality and injury toll and we urge Congress to prioritize proven safety measures and funding for such in the next transportation reauthorization legislation. The public is rightly concerned about the high number of annual traffic fatalities that can and should be prevented.

Thank you for your consideration of these issues. We look forward to working with you to improve safety on our nation's roadways.

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine Chase", with a stylized flourish at the end.

Catherine Chase
President

cc: Members of the U.S. House of Representatives Committee on Transportation and Infrastructure

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- i Traffic Safety Facts 2022: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, Dec. 2024, DOT HS 813 656 (Annual Report 2022).
- ii Annual Report 2022.
- iii Annual Report 2022; [comparing 2012 to 2022].
- iv Traffic Safety Facts: Crash Stats, Early Estimate of Motor Vehicle Traffic Fatalities in 2023, NHTSA, Apr. 2024, DOT HS 813 561 (Early Estimates 2023).
- v Annual Report 2022; [comparing 2012 to 2022].
- vi 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 (Sub Categories 2023).
- vii Annual Report 2022.
- viii Sub Categories 2023.
- ix The Economic and Societal Impact of Motor Vehicle Crashes, 2019, NHTSA, Dec. 2022, DOT HS 813 403. (Economic and Societal Impact 2019).
- x Economic and Societal Impact 2019.
- xi Cost of Motor Vehicle Crashes to Employers – 2019, Network of Employers for Traffic Safety, March 2021.
- xii Annual Report 2022.
- xiii *Id.* Note, the 76 percent figure represents the overall change in the number of fatalities 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 fatalities in truck-involved crashes increased by 21 percent, and between 2016 to 2022, it increased by 27 percent, and between 2015 and 2016, it increased by 14 percent.
- xiv *Id.* 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, and between 2015 and 2015, it increased by 14 percent.
- xv Insurance Institute for Highway Safety (IIHS), Large Trucks. <https://www.iihs.org/topics/fatalitystatistics/detail/large-trucks>.
- xvi 2023 Pocket Guide to Large Truck and Bus Statistics, FMCSA, Dec. 2023, RRA-23-003.
- xvii CPI Inflation Calculator, BLS, available at https://www.bls.gov/data/inflation_calculator.htm, calculated from Jan. 2021 – Jan. 2024.
- xviii Pub. L. 117-58 (2021).
- xix Traffic Safety Facts: Crash Stats, Early Estimate of Motor Vehicle Traffic Fatalities for the First 9 Months (January – September) of 2024, NHTSA, Dec. 2024, DOT HS 813 670.
- xx Campbell, K. L., Fatal Accident Involvement Rates By Driver Age For Large Trucks, *Accid. Anal. & Prev.* Vol 23, No. 4, pp. 287-295 (1991).
- xxi FMCSA Document ID: 2000-84100-0782. American Trucking Associations, Truck Driver Shortage Analysis 2015 (Oct. 2015) and 2019 available here: <https://www.trucking.org/news-insights/ata-releases-updated-driver-shortage-report-and-forecast>
- xxii “The State of Transportation” Hearing, U.S. House of Representatives Transportation and Infrastructure Committee, January 17, 2024. Available at: <https://transportation.house.gov/calendar/eventsingle.aspx?EventID=407090>
- xxiii Hours of Service of Drivers, NPRM (2010 NPRM), FMCSA, 75 FR 82170 (Dec. 29, 2010), citing Dinges, D.F. & Maislin, G., “Truck Driver Fatigue Management Survey,” FMCSA (May 2006), FMCSA-2004-19608-3968.
- xxiv NTSB, Highway, Multivehicle Work Zone Crash on Interstate 95 Cranbury, New Jersey June 7, 2014, Accident Report NTSB/HAR-15/02 (Aug. 11, 2015) and Fatigue, Disregard for Safety Regulations and Oversight Failures Lead to Fatal Bus and Truck Collision in Upstate New York, Report [HIR-24-08](#), December 19, 2024.
- xxv NHTSA, Standing General Order 2021-01 (Aug. 2021). ADS Incident Report Data available here: https://static.nhtsa.gov/odi/ffdd/sgo-2021-01/SGO-2021-01_Incident_Reports_ADS.csv
- xxvi <https://saferoads.org/autonomous-vehicle-tenets/>.
- xxvii Online CARAVAN SURVEY, The Public is Very Concerned About Traffic Safety Even Though They Are Not Aware of the Enormity of the Deadly Toll on our Roadways (Dec. 2024). Available at: <https://saferoads.org/wp-content/uploads/2024/12/Advocates-December-2024-Poll-Report-12-4-24.pdf>
- xxviii *Ibid.*
- xxix *Ibid.*