

Congress of the United States
Washington, DC 20515

May 15, 2023

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

The Honorable Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Secretary Buttigieg and Acting Administrator Carlson:

Thank you for your commitment to Vision Zero, a nationwide effort to reduce traffic fatalities and make our roads safer for children and seniors crossing the street, parents pushing strollers, bicyclists, motorcyclists, people in wheelchairs, and all who share the roads with cars. As the National Highway Traffic Safety Administration (NHTSA) works on updating the federal vehicle safety ratings program, also known as the New Car Assessment Program (NCAP), **we respectfully urge you to include pedestrian protection and visibility from the driver's seat as key criteria for vehicles to score the highest safety star ratings.**

Traffic fatalities in the United States reached a 16-year high in 2021, with vulnerable road users such as pedestrians and cyclists accounting for 20% of those killed.¹ Drivers struck and killed an estimated 7,485 pedestrians—an average of 20 pedestrians each day.² These alarming figures make the United States an appalling exception among developed countries, where fatalities have fallen as a result of thoughtful policies that have made both vehicles and streets safer for their citizens. The European Union, for example, saw a 23% decline in pedestrian deaths between 2010 and 2019, in part due to vehicle regulations to protect pedestrians.³ During that same 10-year period from 2010 to 2019, the number of U.S. pedestrian fatalities increased by 46%.⁴

NCAP has served to educate consumers about vehicle safety while also incentivizing new vehicles to incorporate the latest lifesaving vehicle safety features. In recent times however, some consumer advocates have noted that the program has stagnated.⁵ Nearly all vehicles sold today earn four or five-star NCAP safety ratings—including the vehicles that are most likely to kill pedestrians.⁶ To achieve our shared goal of Vision Zero and reverse the alarming trend in road fatalities, NHTSA should strengthen NCAP by prioritizing pedestrian protection and driver visibility in new vehicles.

¹ <https://www.transportation.gov/briefing-room/us-department-transportation-announces-new-guidance-improve-safety-vulnerable-road>

² <https://www.ghsa.org/resources/Pedestrians22>

³ <https://www.urban.org/urban-wire/more-and-more-american-pedestrians-are-dying-because-larger-vehicles-incorporating-data-safety-regulations-can-help>

⁴ https://www.ghsa.org/sites/default/files/2021-03/Ped_Spotlight_2021_FINAL_3.23.21.pdf

⁵ <https://advocacy.consumerreports.org/wp-content/uploads/2022/06/CR-comments-to-NHTSA-on-NCAP-RFC-6-8-2022-2.pdf>

⁶ <https://nacto.org/2022/06/09/15000-call-for-update-to-ncap/>

NCAP safety ratings should take into account visibility from the driver's seat. Reduced driver visibility presents a lethal danger to pedestrians and other vulnerable road users. New vehicle sales in the U.S. are increasingly dominated by vehicles that are larger and heavier, and with bigger blind zones. Larger vehicles such as SUVs, pickup trucks, and vans are significantly more likely to hit pedestrians when making turns, and deadlier when they do impact pedestrians, according to the Insurance Institute for Highway Safety. The fatality rate for a pedestrian struck by a pickup truck turning right is 89% higher compared with being struck by a car, and 63% higher for an SUV than a car.⁷ Over five hundred thousand crashes occur each year due to blind spots according to NHTSA's estimates,⁸ and a driver involved in a fatal vehicle crash must then live with the consequences and psychological toll of inadvertently causing a death and bringing irreparable heartbreak and grief to the family of the crash victim.⁹ Additionally, thousands of children are injured or killed annually in frontover crashes, in which a driver moving forward slowly does not see the child in front of the vehicle.¹⁰ Consumers who are shopping for new vehicles should have complete and accurate information readily available pertaining to driver visibility.

The Blind Zone Calculator developed by DOT's Volpe Center can be a crucial resource as NHTSA makes updates to NCAP safety ratings. This visualization tool helps users understand how far a vehicle's blind zones extend.¹¹ For example, one of the best-selling vehicles in the US market, a large pickup truck, contains blind zones that significantly obstruct the driver's vision; up to six preschool students standing in front of the vehicle are completely invisible to the driver.¹² We encourage NHTSA to use this tool and incorporate its data in the NCAP ratings.

In addition to prioritizing visibility from the driver's seat in NCAP safety ratings, NCAP should also take into account pedestrian protection and survivability in vehicle design. In a 2020 U.S. Government Accountability Office (GAO) report on pedestrian safety, the GAO recommended that NHTSA decide whether to include pedestrian safety tests in NCAP.¹³ The European NCAP incorporates safety tests for how well vehicles protect vulnerable road users, such as pedestrians and cyclists, with whom they may collide.¹⁴ We are encouraged to see that NHTSA is considering the inclusion of pedestrian protection systems in the updated NCAP. We encourage you to consider incorporating assessments that improve pedestrian safety for people of color, particularly Black and brown pedestrians, who are more than twice as likely to be struck and killed compared to white pedestrians.¹⁵ Given the EU's successes in reducing road fatalities, we strongly urge NHTSA to take into account the safety of people outside the vehicle in NCAP safety ratings.

⁷ <https://www.iihs.org/news/detail/suvs-other-large-vehicles-often-hit-pedestrians-while-turning>

⁸ <https://www.nhtsa.gov/sites/nhtsa.gov/files/2022-03/NCAP-ADAS-RFC-03-03-2022-web.pdf>

⁹ <https://www.newyorker.com/magazine/2017/09/18/the-sorrow-and-the-shame-of-the-accidental-killer>

¹⁰ <https://kidsandcars.wpenginepowered.com/wp-content/uploads/2023/03/Frontover-Fact-Sheet.pdf>

¹¹ <https://blindzonecalculator.herokuapp.com/>

¹² <https://blindzonecalculator.herokuapp.com/getinfo/991>

¹³ <https://www.gao.gov/products/gao-20-419>

¹⁴ <https://www.euroncap.com/en/vehicle-safety/the-ratings-explained/vulnerable-road-user-vru-protection/>

¹⁵ <https://smartgrowthamerica.org/dangerous-by-design/>

Thank you again for your thoughtful attention to reversing the deeply alarming trend of U.S. roads becoming deadlier for pedestrians, cyclists, and other vulnerable road users. We must not allow this lethal trend to become the norm, and we look forward to working with you to improve safety for drivers, pedestrians, cyclists, and all.

Very truly yours,



Jamie Raskin
Member of Congress



Jan Schakowsky
Member of Congress



Eleanor Holmes Norton
Member of Congress



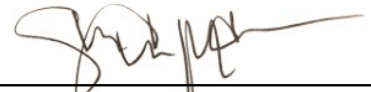
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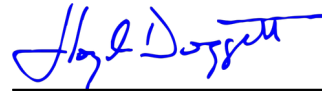
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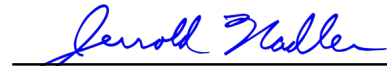
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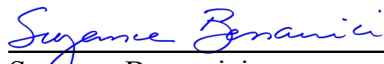
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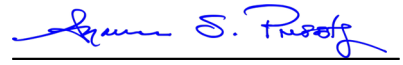
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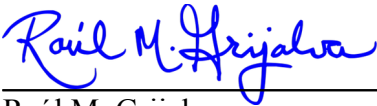
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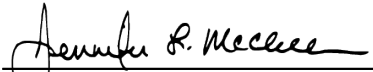
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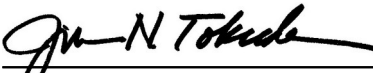
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