

# Congress of the United States

## House of Representatives

COMMITTEE ON OVERSIGHT AND ACCOUNTABILITY

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May 30, 2024

The Honorable Gene L. Dodaro  
Comptroller General of the United States  
Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548

Dear Comptroller General Dodaro:

I am writing to request that the Government Accountability Office (GAO) conduct a review of U.S. vehicle safety design standards and their effects on the safety of vulnerable road users such as pedestrians and bicyclists.

Traffic fatalities in the United States have persisted at alarming levels, with the number of pedestrians and bicyclists killed annually reaching record-highs. Drivers struck and killed an estimated 7,522 pedestrians and 1,105 cyclists in 2022, according to the most recent data available from the National Highway Traffic Safety Administration (NHTSA).<sup>1</sup> This deadly trend on our roadways has made the United States an appalling exception among developed countries, which have made substantial progress in advancing road safety for their citizens through robust vehicle safety standards and smart street design. Between 2010 to 2019, the European Union oversaw a 23% decline in pedestrian deaths.<sup>2</sup> In contrast, between 2009 to 2019, U.S. pedestrian and cyclist fatalities increased nearly 50 percent from 4,800 to 7,200, according to a 2021 GAO report.<sup>3</sup>

NHTSA manages the New Car Assessment Program, which provides consumers with information on the safety of new passenger vehicles. While NHTSA has proposed updates to the New Car Assessment Program to include crash avoidance technologies, the size and design of vehicles on U.S. roadways may continue to pose safety risks for vulnerable road users. According to the Insurance Institute for Highway Safety (IIHS), “over the past 30 years, the average U.S. passenger vehicle has gotten about 4 inches wider, 10 inches longer, 8 inches taller, and 1,000 pounds heavier.”<sup>4</sup> These changes may have made vehicles safer for occupants, while unintentionally harming pedestrians and cyclists. From 1997 to 2022, the percentage of highway fatalities involving vehicle occupants dropped from 80 percent to 64 percent; over that same period, the

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<sup>1</sup> <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813563>

<sup>2</sup> <https://www.urban.org/urban-wire/more-and-more-american-pedestrians-are-dying-because-larger-vehicles-incorporating-data-safety-regulations-can-help>

<sup>3</sup> <https://www.gao.gov/products/gao-21-405>

<sup>4</sup> <https://www.iihs.org/news/detail/vehicles-with-higher-more-vertical-front-ends-pose-greater-risk-to-pedestrians>

share of fatalities involving pedestrians, cyclists and non-vehicle occupants increased from 20 percent to 36 percent.<sup>5</sup>

A growing body of research has identified specific concerns with how the height and geometry of a vehicle's front end can affect the safety of pedestrians and cyclists. For example, IIHS recently found that vehicles with taller and more-blunt front-end designs were associated with significant increases in pedestrian fatality risk, compared with low and sloped front ends.<sup>6</sup> The IIHS study concluded that vehicle designs with front ends that are lower and more sloped could reduce the risk of fatal pedestrian injuries.

Although large vehicles only make up 4 percent of the U.S. fleet, they are involved in 10 percent of pedestrian and bicyclist fatalities.<sup>7</sup> The Department of Transportation's Volpe Center has examined the safety benefits of encouraging "direct vision" in vehicles, which refers to the ability of drivers to see outside their vehicles. About 25 percent of pedestrian deaths in collisions with large trucks involve blind zones.<sup>8</sup> Several companies and cities in the United States have recognized the benefits of direct vision vehicles in reducing blind zone risks and added direct vision vehicles to their fleets.

Highway safety regulators in several countries have considered ways to improve drivers' ability to see pedestrians and cyclists and avoid crashes. For example, the United Nations Economic Commission for Europe (UNECE) has adopted regulations that will help increase the ability of drivers of passenger and commercial vehicles to detect and see pedestrians and cyclists before a crash occurs.<sup>9</sup> Specifically, the U.N. regulations are collectively intended to help mitigate the wide blind-spot area and poor direct vision around the front and side of the vehicles, including for large and heavy trucks. Regulators in the European Union and Japan have indicated that they will implement the new regulations, according to the UNECE.<sup>10</sup>

In the United States, federal regulators could likely do more to address the safety risks to pedestrians and cyclists posed by unsafe vehicle designs, and there are multiple entities with important roles to play. For example, the primary mission of the Federal Motor Carrier Safety Administration (FMCSA) is to reduce crashes and fatalities involving large trucks and buses. Meanwhile, NHTSA regulates the safety of motor vehicles, including passenger cars and commercial trucks, and is responsible for setting and enforcing Federal Motor Vehicle Safety Standards. As mentioned above, NHTSA also manages the New Car Assessment Program, which provides consumers with information on the safety of new passenger vehicles. In 2020, GAO found that although NHTSA proposed pedestrian safety tests for NCAP in 2015, NHTSA did not have a clear process for updating the program and had not made a decision on how to proceed.<sup>11</sup> As of May 2024, NHTSA has yet to implement GAO's recommendations to (1) document the

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<sup>5</sup><https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813560#:~:text=In%202022%20an%20estimated%20.38,injured%20from%202020%20to%202021.>

<sup>6</sup><https://www.iihs.org/topics/bibliography/ref/2294>

<sup>7</sup><https://www.fmcsa.dot.gov/safety/data-and-statistics/people-table-19-pedestrians-and-bicyclists-killed-large-truck-bus-and-1>

<sup>8</sup>[https://www.volpe.dot.gov/sites/volpe.dot.gov/files/2023-01/Volpe\\_Annual\\_Accomplishments\\_Jan2023\\_508.pdf](https://www.volpe.dot.gov/sites/volpe.dot.gov/files/2023-01/Volpe_Annual_Accomplishments_Jan2023_508.pdf)

<sup>9</sup><https://unece.org/media/press/373454>

<sup>10</sup>Ibid.

<sup>11</sup><https://www.gao.gov/products/gao-20-419>

overall process for making changes to NCAP; and (2) decide whether to include pedestrian safety tests in NCAP and communicate this decision and rationale to relevant stakeholders and the public.

In the interest of improving road safety and protecting vulnerable road users, I request that GAO evaluate the following questions:

- (1) What is known about the relationship between the design of passenger and commercial vehicles—including their height, geometry, driver visibility and direct vision, and other design factors—and the increase in pedestrian and cyclist fatalities in the United States?
- (2) What actions have automakers, regulators, and stakeholders in other countries taken to reduce the risks to pedestrians and cyclists caused by large vehicles, including commercial trucks?
- (3) What challenges, if any, do automakers, NHTSA, and FMSCA face addressing the persistent trend in pedestrian and cyclist fatalities, as they relate to vehicle height, geometry, and other design factors?
- (4) What options should Congress, NHTSA, and FMSCA consider to reduce the risks of pedestrian and cyclist fatalities related to the design of passenger and commercial vehicles?

Thank you for your thoughtful consideration of this request. I look forward to working with you and your staff to identify solutions to these critical road safety concerns.

Very truly yours,



Jamie Raskin  
Ranking Member