



Intelligent Car Coalition

June 29, 2020

Docket Management Facility
US Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Level
Room W12-140
Washington, DC 20590-0001

RE: Docket No. NHTSA 2020-0006

To Whom It May Concern:

The Intelligent Car Coalition is a longtime leader in federal transportation policy thought leadership. We respectfully submit the enclosed comments with the aim of helping to enhance the quality, utility and clarity of the information to be collected. We believe that in order to glean accurate information from the focus groups NHTSA proposes, it must give the respondents accurate information about the 5-Star Safety Ratings program itself.

While significant strides have been made in adding technologies to vehicles that help *prevent* crashes, we haven't made the same advancements when it comes to testing how well the occupants of vehicles are protected *when* they crash.

Government mandates related to crash testing are outdated and inequitable, and as a result we are losing thousands of lives needlessly every year. Disparities in testing mean that some consumers – mainly average-weight males – may be accounted for accurately by the 5-Star Safety Ratings program. But many of us – namely women, elderly, young and obese people – are not accurately assessed for crash test risk, and therefore not accurately reflected in this program.

For example, more than 8,500 American women were killed in car crashes in 2018. A majority of them (61%) were in the driver's seat. In addition, that same year, over one million women were injured in car crashes; 76% of these women located in the driver's seat. But NHTSA's current crash test regime does not require testing female dummies in the driver's seat.

Many of those injuries and deaths would be preventable if testing required vehicle manufacturers to design and test vehicles with every body in mind. Unfortunately, this is not yet the case. And again, because the 5-Star Safety Ratings program does not report the non-equitable nature of the underlying crash tests, it may be

difficult for a consumer who is attempting to use the 5-Star Ratings program to evaluate a vehicle to know whether the crash test ratings apply to them – especially if they are not an average-weight male.

Overall, NHTSA data show women are 17%-18.5% more likely to die in a vehicle crash than men. That means up to 1,342 women are needlessly dying every year. In addition, these data show we are losing more than 1,600 young adults and elderly people every year to crashes who need not die.¹ Surely this is the kind of information that a consumer would want to know before purchasing a vehicle. But because the non-equitable nature of crash-testing is not addressed in the program, they might never know.

Crash testing practices are out of date. In addition to failing to test every body in every seat position, many crash tests are based on crash test dummies that represent the average sized male from the 1970s. While crash test dummy manufacturers have innovated and produced products that greatly increase the data available for analysis -- through the creation of dummies that represent women, by employing more biofidelic elements, and by adding multiple sensors -- the regulatory requirements for OEMs have not been sufficiently updated to reflect the availability of more accurate equipment.

Until tests measure the impact of a crash on every body, it will be impossible for NHTSA to say that its 5-Star Safety Ratings program applies to every American consumer. As you conduct your information-gathering on the program, please take into account the inequities inherent in testing, and the lack of knowledge consumers carry about these inequities. Until appropriate changes to the underlying testing regime are made, we believe that anyone who evaluates the 5-Star program should be told about the underlying biases before assessing it.

Respectfully submitted,

Catherine McCullough

Executive Director

Intelligent Car Coalition

¹ Source: National Highway Transportation Safety Administration, "[Fatality Analysis Reporting System](#)," Accessed March 2020.