



January 13, 2021

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
Docket Management Facility, M-30
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket No. NHTSA-2021-0033

Dear Secretary Buttigieg:

Thank you for allowing the National Safety Council (NSC) to respond to the National Highway Traffic Safety Administration's (NHTSA) Request for Comment (RFC) on Government 5-Star Safety Ratings Monroney Label Consumer Research.

NSC is America's leading nonprofit safety advocate and has been for over 100 years. As a mission-based organization, we work to eliminate the leading causes of preventable death and injury, focusing our efforts on the workplace, roadway and impairment. We create a culture of safety to keep people safer at work and beyond so they can live their fullest lives. Our more than 15,500 member companies represent 7 million employees at nearly 50,000 U.S. worksites.

NSC believes the development, design and accessibility of vehicle technology are key components to addressing the tragic trend of roadway fatalities. Improvements in vehicle safety must take into account risks to both vehicle occupants and non-occupants, and ways to mitigate these risks must be clearly communicated to the public. We applaud the proposed action of NHTSA to conduct qualitative research to identify ways to improve the information displayed and communicated through the 5-Star Safety Ratings.

NHTSA should conduct this research to improve the sharing of information by engaging a diverse set of consumers. NSC recommends that NHTSA takes steps to diversify focus group participants by having representative selection in each focus group so as to ensure the best, and sometimes overlooked, input and information possible is captured throughout this process. This diversity will yield a variety of recommendations to better ensure important vehicle information is communicated with all consumers in ways that work best for them.

Importance of Government 5-Star Safety Ratings

Consumers need confidence in the safety of their vehicles and transparency around the process to determine the safety ratings. The information displayed on the Monroney label as part of the Government 5-Star Safety Ratings is vital to build that confidence. Not only should the information convey the impact of safety systems on people inside the vehicle, but also, it should incorporate information on how vehicle safety systems impact people outside the vehicle too. For example, NSC recommends vehicles incorporate pedestrian protection features into vehicles. Sharing information about these features on the Monroney label will help people better understand them and, safety features create incentives for some consumers to purchase vehicles.

Additionally, we applaud NHTSA taking time to study the 5-Star Safety Ratings Label and urge you to evaluate how the labels are used and understood by consumers. The labels should be using approachable and well-understood language that all people can understand to describe what vehicle features do and also what they do not do. NSC believes, and research consistently supports,^{1,2} that consumers do not understand new vehicle technologies. Education and training are required to speed adoption and proper use of these features. However, to reach the full safety potential of the technology, consumers must also be informed on the limitations of the technologies available. For example, consumers' level of understanding with regard to proper Advanced Driver Assistance Systems (ADAS) use is a key safety consideration, which is why NSC created the website [MyCarDoesWhat.org](https://www.mycardoeswhat.org). This free resource helps consumers learn about the safety features specific to their make and model of vehicle. NSC stands ready to work with DOT to enhance MyCarDoesWhat to ensure all consumers understand how to make full use of vehicle safety features.

Additional Recommendations for Improvements to Government Testing and Ratings

As NHTSA explores the need for improved ways to communicate the safety ratings and safety information to consumers, NSC believes this is also an opportunity to improve vehicle testing through the New Car Assessment Program (NCAP). It is important that the information displayed by the Government 5-Star Safety Ratings Label communicates the results of the most comprehensive testing available.

Unfortunately, under current NCAP testing guidelines and processes, we know there are gaps to the information that is captured and communicated. NCAP must be updated to reflect advances in safety technology and incorporate the use of more representative test

¹ <https://www.consumerreports.org/automotive-technology/how-much-automation-does-your-car-really-have-level-2-a3543419955/>

² <https://www.jdpower.com/business/press-releases/2021-mobility-confidence-index-mci-study>

dummies, including testing female crash dummies. NSC supports changes to NCAP, at a minimum, for crash avoidance, crashworthiness and pedestrian detection.

- **Crash avoidance.** NSC believes NCAP must evolve to reflect improvements in recent years to crash avoidance and post-crash technologies. Safety technologies to provide advanced warnings or intervene can potentially prevent a crash due to human factors.
- **Crashworthiness.** While car technology is making cars safer, NCAP should modernize to reflect post-crash engineering advancements in reducing fatalities and the severity of injuries.
- **Pedestrian protection.** In 2020, an estimated 6,721 pedestrians were killed.³ Advances in technology and vehicle design changes can save lives of these vulnerable road users.
- **Test dummy diversity.** NHTSA should update the crash test dummy criteria to reflect the diversity in our society to include female crash test dummies and others.

Additionally, NHTSA should work with manufacturers to ensure that safety features are offered as standard on vehicles at no additional cost to consumers. Currently, many safety technologies are part of “packages” that come at an additional cost to consumers. Thank you for taking the time and focusing resources on addressing improvements to the Government 5-Star Safety Ratings. NSC knows that improved consumer information and communication leads to safer mobility for all road users and urges NHTSA to take advantage of this opportunity to improve safety for all roadway users.

Sincerely,



Lorraine Martin
President and CEO

³ <https://www.ghsa.org/resources/news-releases/GHSA/Ped-Spotlight-Addendum21#:~:text=GHSA%20projects%20there%20were%206%2C721,increase%20from%201.9%20in%202019.>