

## Comment from Anonymous

Posted by the **National Highway Traffic Safety Administration** on Mar 14, 2022

I'm dismayed to see that this proposal does not adequately address the megacar crisis we currently face in the US. By focusing on the safety of passengers and not comprehensively addressing the safety of pedestrians, cyclists, and other vulnerable road users who are increasingly likely to die in a crash with increasingly large and heavy vehicles, the NHTSA is perpetuating the public health epidemic of traffic violence that is plaguing our country. Indeed, we see that: "SUVs, pick-ups and other big, heavy automobiles claimed a staggering 78 percent of the market last year. Such vehicles, which the feds collectively call "light trucks," consistently rate highly on existing NCAP tests, but are two to three times more likely to kill a walker in the event of a crash than smaller models, mostly thanks to their weight, height, and typically aggressive front-end vehicle design — all of which inflict more damage on the internal organs, heads and necks of walkers than lighter, lower-profile cars, which are more likely to strike a pedestrian's lower extremities." (<https://usa.streetsblog.org/2022/03/08/fed-vehicle-safety-rating-update-wont-get-megacars-off-the-road/>)

The proposed automated safety technologies will not do enough to stop road deaths of vulnerable users, and I implore the NHTSA to amend its proposal to prioritize, strengthen, implement, and make permanent its "plans to propose a crashworthiness pedestrian protection testing program in NCAP in 2022" (p. 165).

Moreover, it's imperative that the NHTSA deploys crash test dummies that represent the full variety of human body types, including cisgender women and nonbinary people assigned female at birth as well as children and people who ride wheelchairs. Research shows that using dummies modeled on the average male results in higher fatality rates for anyone outside of that body type.