

Comment from Colin Brown

Posted by the **National Highway Traffic Safety Administration** on Mar 21, 2022

I commend the NHTSA for updating vehicle safety ratings to finally include some consideration for impacts to road users outside of vehicles; however, I am disappointed to see no meaningful action has been taken to account for the risk passenger vehicle design poses to other road users.

The most important factor contributing to the sharp rise in deaths on American streets over the past decade has been the industry wide shift to larger, heavier vehicles. These vehicles, particularly SUVs and trucks, have poorer sightlines, longer stopping distances, and when their drivers crash into other road users, their angular frames result in more devastating injuries.

As a transportation planner, I work now almost exclusively on how to stop drivers of these vehicles from critically injuring or killing vulnerable street users, namely pedestrians, bikers, the elderly, children, and those with mobility challenges--in short, anyone not inside another truck or SUV.

This is not a question of technology but of simple physics. The seachange in passenger vehicle size over the past decade is readily apparent and its consequences are being realized everyday, as the United States continues to be the only developed country experiencing such skyrocketing traffic deaths in the world over that time period.

I urge the NHTSA to put forward clear guidelines for automakers to reign in what has become an ever-escalating race to build larger and larger passenger vehicles. This trendline effectively kills any progress made by Vision Zero initiatives across the country to date and is clearly moving in the wrong direction.