## **Comment from Justin Bigelow**

This proposal fails to address, let alone quantify and rate, the safety and crash impacts to vulnerable road users including pedestrians, bicyclists, and other micro-mobility users. NHTSA should follow the lead of other international crash safety programs and rate overall vehicle safety with special deference to the upsurge in pedestrian and other vulnerable road user deaths, which are caused in part by the increasing weight, grille height, and overall size of new vehicles sold in the United States.