

## **Comment from Bikemore**

These proposed standards focus entirely too much on technology to solve problems inherent in vehicle design, and lack adequate measures to address major issues like forward blind spots due to increasing vehicle size and hood height.

Safety of vulnerable road users outside of the vehicle must be assessed and evaluated to the same standards as passengers. Vehicles currently rating highly on NCAP tests are significantly more likely to kill someone walking or biking in the event of a crash vs. smaller models, mostly thanks to the additional height or weight of full size pickup trucks and SUVs. NHSTA must adopt the standards and processes of other international crash safety programs: a design pedestrian/vulnerable road user of a 2 year old child should be adopted, and comprehensive testing programs for crashworthiness pedestrian and bicyclist testing programs must be established and made permanent.

Technology solutions should only serve to enhance safety beyond intrinsically safer vehicle design. Any and all technologies to reduce vulnerable road user deaths on the market should be made mandatory, and additional technologies should be introduced to govern/limit egregious vehicle speeds.

Crash testing must also include designs for all bodies, not just the current prioritization of an average male.

These standards have been laughable for too long--and the result is a skyrocketing rate of vulnerable road user deaths that are entirely preventable. Failure to include these most basic requirements would leave this agency culpable for the deaths of thousands.