



June 3, 2022

**Safe Kids Worldwide and Safe Kids in Automated Vehicle Alliance  
Comment to the National Highway Traffic Safety Administration  
Federal Register Notice No. 87 FR 27200  
Response to the NHTSA Request for Information:  
New Car Assessment Program**

**RE: Docket No. NHTSA-2021-002**

**Highlights**

- **Safe Kids and SKAVA believe any update of the New Car Assessment Program (NCAP) must take into consideration children’s safety.**
- **As new technologies are adopted, NHTSA should consider how they will specifically impact children who must also ride in a vehicle.**
- **Safe Kids and SKAVA strongly recommend including technologies, such as rear seat reminders, to prevent pediatric heat-stroke.**

**Response to NHTSA RFI**

Safe Kids Worldwide (Safe Kids) and the Safe Kids in Automated Vehicles Alliance (SKAVA) appreciate the opportunity to provide comment on updates to the New Car Assessment Program. NHTSA has identified Advanced Driver Assist Systems as a priority area for a possible update to NCAP. Safe Kids supports updating NCAP to include new vehicle safety technologies that could help prevent car crashes and injuries. As NHTSA considers specific performance criteria and testing of these new systems, we urge NHTSA to include children’s safety as part of these considerations.

Safe Kids would specifically like to comment on questions 84-87 of NHTSA’s RFI and the issue of pediatric heatstroke.

According to NHTSA, over 900 children have died of heatstroke since 1998. These children were either left in a hot car, knowingly or unknowingly, or entered the vehicles on their own and became trapped.<sup>1</sup> In 2018 and 2019, 53 kids died each year due to hot car deaths.<sup>2</sup> This is unacceptable.

Safe Kids has worked with partners in the highway safety community and at NHTSA to bring awareness to parents and caregivers about the dangers of leaving children alone in cars. We have also consistently supported the addition of technology which exists now and could help prevent these tragic deaths.

As NHTSA updates NCAP, Safe Kids recommends that points and credit be given to strong, robust systems that can detect and prevent children from being left in a vehicle. Unlike door logic systems, detection systems can more accurately differentiate between the presence of an occupant and some other reason for rear door entry. Depending on the specific integration into a vehicle platform, such systems may also have the potential for detecting the presence of children who enter vehicles on their own and become entrapped. Last but not least, detection system notification is not as likely to become a common occurrence that may eventually be ignored by drivers.

**About Safe Kids Worldwide**

Preventable injuries are the number one cause of death for children in the United States – and a million

more children are injured every year. The top causes of unintentional injury-related death to children in the United States include motor vehicle crashes as occupants, pedestrian and pedalcyclists, suffocation, drowning, poisoning, and fire/burn incidents. Almost as many children ages 0-19 die each year from preventable injuries as the next three deadliest causes combined – homicide, suicide, and cancer.

Safe Kids Worldwide (Safe Kids) is a grassroots non-profit dedicated to protecting kids from preventable injuries. We are a resource to help parents and caregivers keep kids safe from car crashes, fires, falls, poisoning and more. Through more than 400 coalitions in the U.S. and partners in more than 30 countries, Safe Kids works with children’s hospitals, trauma centers, first responders and public health experts to get evidence-informed, life-saving information to families, no matter where they live. Safe Kids engages in all pillars of improving public health and prevention which include research, education, awareness, and public policy advocacy. Our comprehensive model puts the issue and families with children at the center of all that we do and makes us one of the most experienced, multi-dimensional, and knowledgeable organizations in the childhood injury space.

Safe Kids was founded in 1988 by Martin R. Eichelberger, M.D., a pediatric trauma surgeon, and Herta Feely, a public relations professional, at Children’s National Hospital in Washington, D.C. Since our inception, the work of Safe Kids has contributed to the more than 60 percent reduction in childhood unintentional injury deaths in the U.S.

Since 1988, Safe Kids has:

- Worked with partners to reduce the number of deaths/injuries to children in car crashes by more than 50 percent and to reduce the number of child pedestrian fatalities by more than 40 percent.
- Educated more than 29 million parents and caregivers on how to keep kids safe in and around cars, and more than 16 million children about pedestrian safety.
- Inspected more than 2 million car seats for proper selection, installation, and use.
- Provided more than 700,000 car seats to at-risk families in the U.S.
- Advocated for new, tougher rear-facing car seat laws now in seventeen states, as well as for safer school zones, including more crosswalks, lower speed limits, crossing guards and traffic lights.

Losing one child is one too many, and we do not want any family to have to endure the loss of a child. We are calling on everyone to come together, to raise awareness and to get involved. Saving lives is a decision we can all make every day. All children deserve the right to be safe, healthy, and strong so they can grow up to become whatever they can imagine.

### **Safe Kids Worldwide and Automated Vehicles**

Safe Kids Worldwide convened a Blue-Ribbon Panel (BRP) of nationally recognized child safety advocates and transportation experts in 2018 to discuss the unique safety considerations of children in automated vehicles (AVs). [The BRP Children in Automated Vehicles recommendations report](#) (October 2018) serves as a call to action for automated vehicle developers to evaluate and ensure their products are created with the protection of child passengers in mind. In the [2018 press release](#), the BRP specifically asked the automated vehicle industry to:

- Support child-focused regulations,
- Test AVs in ways that consider child passengers,
- Design vehicles that are family-friendly,
- Conduct research on the appropriate level of supervision in AVs, and

- Ensure all marketing and advertising shows children riding in AVs according to best practices.

The BRP also recommended convening a multi-year consortium to monitor research and progress, and to generate ongoing policy statements and advocacy guidance that reflect an evolving field. To continue the work of the BRP, the Children in Automated Vehicles Consortium was subsequently formed to monitor developments in the AV field and implement the BRP recommendations. The Consortium, a network of subject matter advocates and specialists, was organized into two broad working groups:

- Policy/Legislation and Enforcement Working Group, and
- Public Information and Education Working Group.

The result of the Consortium's work was the production of a new [Children in Automated Vehicles advocacy toolkit](#) for safety professionals to help advocate for safety considerations in AVs. The toolkit includes:

- Model legislation for global use and examples of current legislation that address children in AVs,
- Education resources (e.g., infographic, fact sheet, PowerPoint, social shareables, etc),
- Considerations for how regulations can avoid unintended consequences for children,
- Recommendations for including children every time vehicle regulations are amended for automated technologies,
- Recommendations for updating crash data collection and reporting guidelines and tools to capture child data in AVs, and
- Recommendations for training and educations on-scene first responders and law enforcement on child passengers in AVs.

At Safe Kids' 2021 PrevCon, we announced the next phase of this work, the creation of the Safe Kids in Automated Vehicles Alliance. SKAVA works to ensure that the safety needs of children are actively considered throughout the research, testing, and development of AVs. We are encouraged by the expansion of automated driving features and their potential to prevent or mitigate crashes. SKAVA's priority is to facilitate stakeholder discussion, collaboration, and action toward enhancing the safety of children as these technologies evolve, thereby reducing the risk of injury and death.

### **Closing**

Car crashes continue to be a leading cause of death and injury among children. Safe Kids Worldwide and SKAVA applaud Department of Transportation Secretary Pete Buttigieg and NHTSA Acting Administrator Steven Cliff for their work to update the U.S. NCAP program.

As NHTSA looks to update NCAP, Safe Kids and SKAVA believe that children's safety must be a key consideration. Performance criteria should take children into consideration, and NHTSA should consider existing technologies which can help prevent pediatric heatstroke as part of the NCAP update.

It is critical that we protect our children from preventable traffic crashes and vehicular heatstroke.

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<sup>1</sup> National Highway Traffic Safety Administration. Prevent Hot Car Deaths: Where's Baby. U.S. Department of Transportation. Available at: <https://www.nhtsa.gov/campaign/heatstroke>

<sup>2</sup> Null, J. (2022, May 19). Heatstroke Deaths of Children in Vehicles. Department of Meteorology and Climate Science, San Jose State University. Available at: <https://www.noheatstroke.org>