

July 27, 2022

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
The Honorable Steven Cliff
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Letter in Support of Matthew Brumbelow, senior research engineer at the Insurance Institute for Highway Safety (IIHS) as a Nominee to the Advisory Committee on Underride Protection

Dear Secretary Buttigieg and Administrator Cliff,

On July 6, 2022, the National Highway Traffic Safety Administration (NHTSA) National Highway Traffic Safety Administration (NHTSA), Department of Transportation (DOT) published a Solicitation of nominations for appointment to the advisory committee on Underride Protection (ACUP) in the Federal Register. The National Association of Mutual Insurance Companies (NAMIC) welcomes the opportunity to support the nomination of Matthew Brumbelow to the ACUP.

NAMIC is the largest property/casualty insurance trade group with a diverse membership of more than 1,500 local, regional, and national member companies, including seven of the top 10 property/casualty insurers in the United States. NAMIC members lead the personal lines sector representing 55 percent of the auto market. Through our advocacy programs we promote public policy solutions that benefit NAMIC member companies and the policyholders they serve and foster greater understanding and recognition of the unique alignment of interests between management and policyholders of mutual companies.

I provide this letter in support of Matthew Brumbelow to be named to the DOT advisory committee on Underride Protection. Matthew Brumbelow is a senior research engineer at the IIHS, where he has worked since 2002. As you are aware, IIHS is a U.S. nonprofit organization funded by auto insurance companies, established in 1959. It works to reduce the number of motor vehicle traffic collisions, and the rate of injuries and amount of property damage in the crashes that still occur. It carries out research and produces ratings for popular passenger vehicles as well as for certain consumer products such as child car booster seats. It also conducts research on road design and traffic regulations and has been involved in promoting policy decisions.

I am a member of the Board of Directors of the IIHS and have seen the quality of Mr. Brumbelow's work over the years. Most of Mr. Brumbelow's research has focused on how vehicle structure and restraint system performance in laboratory test conditions relates to real-world crash outcomes. His findings have contributed to the development of the IIHS front crash, roof strength and headlight ratings, as well as its evaluations of truck underride guards.



His research on real-world truck underride crashes led to the development of the Institute's truck underride crash test suite and ToughGuard awards. Most relevant to the Advisory Committee on Underride Protection is Mr. Brumbelow's work "Evaluation of US Rear Underride Guard Regulation for Large Trucks Using Real-World Crashes" which was cited in the July 2022 NHTSA final rule on Federal Motor Vehicle Safety Standards: Rear Impact Guards, Rear Impact Protection. Mr. Brumbelow received a bachelor's degree in mechanical engineering from the University of Virginia.

The advisory committee, NHTSA and DOT will greatly benefit from Mr. Brubelow's participation and NAMIC wholeheartedly supports his nomination. If you have any questions or require further information, please contact me at nalldredge@namic.org.

Thank you for your time and consideration.

A handwritten signature in black ink that reads "Neil Alldredge". The signature is fluid and cursive, with the first name "Neil" being larger and more prominent than the last name "Alldredge".

Neil Alldredge
President/CEO
National Association of Mutual Insurance Companies