



**December 16, 2022**

**Safe Kids Worldwide and Safe Kids in Automated Vehicle Alliance  
Comment to the National Highway Traffic Safety Administration**

**Federal Register Notice No. 2022-22423**

**Response to NHTSA Request for Comment:**

**Proposed Data Collection Regarding Child Passenger Safety Perceptions and Practices in Ridesharing  
and Autonomous Vehicles**

**RE: Docket No. NHTSA-2022-0080**

**Response to Request for Comment**

Safe Kids Worldwide and SKAVA strongly support the proposed data collection by the National Highway Traffic Safety Administration (NHTSA) on attitudes and behaviors of caregivers and rideshare drivers about child passenger safety practices. Such data will not only help NHTSA continually improve its occupant protection programs and policies in an expanding mode of transport but will also be useful for the broader safety community as we work to reach communities that rely on rideshares as a transport mode or as a source of their livelihoods.

As NHTSA notes in its request for comment (RFC), the use of ridesharing services by adult Americans has increased dramatically in recent years, more than doubling as a percentage of the adult population between 2015 and 2018. The safety community has come to understand anecdotally and through emerging evidence that child passenger safety behaviors on many such trips are inconsistent with best practices. Causes may include limited availability of child restraint systems (CRS) in such vehicles and occupant protections laws exempting taxi, livery, and rideshare vehicles from child restraint requirements. More complete data on caregiver and driver attitudes, as well as the challenges faced by both groups, can inform the work of both NHTSA and the broader traffic safety community to address these inconsistencies.

**About Safe Kids Worldwide**

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.

**About Safe Kids in Autonomous Vehicles Alliance**

The Safe Kids in Automated Vehicles Alliance (SKAVA) is a stakeholder group including nationally recognized child safety advocates and transportation experts working 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.