



Marianne Karth <mariannekarth@gmail.com>

## Front Override Guards: "Troopers release video showing aftermath of fiery Ohio bus crash that killed 6"

Marianne Karth <mariannekarth@gmail.com>

Wed, Nov 29, 2023 at 12:53 PM

To: "Syed, Mohsin (OST)" <mohsin.syed@dot.gov>

Cc: "Schweninger, Emily (OST)" <emily.schweninger@dot.gov>, "Teicher, Paul (OST)" <Paul.Teicher@dot.gov>, "Posten, Ryan (NHTSA)" <ryan.posten@dot.gov>, "Myers, James (NHTSA)" <james.myers@dot.gov>, "Shulman, Sophie (NHTSA)" <sophie.shulman@dot.gov>, "Carlson, Ann (NHTSA)" <ann.carlson@dot.gov>, "Goldstein, Scott (OST)" <scott.goldstein@dot.gov>, Jerry <jkarth1@yahoo.com>, "Miller, Theodore (Gillibrand)" <Theodore\_Miller@gillibrand.senate.gov>, "Sidharta, Anthony (Gillibrand)" <Anthony\_Sidharta@gillibrand.senate.gov>, "Bock, Sophia (Lujan)" <Sophia\_Bock@lujan.senate.gov>, "Schnelle, Alex" <Alex.Schnelle@mail.house.gov>, "Hutcheson, Robin (OST)" <robin.hutcheson@dot.gov>

Bcc: Jaron Bourke <jaron.bourke@gmail.com>, Andy Young <andy@truckaccidents.com>, Stephen Bingham <smbingham@earthlink.net>, eric hein <ewh161@gmail.com>, Lois Durso <durso.lois@gmail.com>

Mohsin,

I am forwarding to you an email which I sent this morning to Rob Molloy at the NTSB regarding the recent horrific bus/semi/SUV chain reaction crash. I have brought up to DOT, numerous times, the need for the U.S. to adopt the [UNECE 93 Front Override/Underride Protection \(FUP\)](#) regulation. Front override guards were included in my family's 2014 petition along with side guards and improved rear guards:

**NHTSA is still evaluating the Petitioners' request to improve side guards and front override guards and will issue a separate decision on those aspects of the petition at a later date.** <https://www.federalregister.gov/d/2014-16018/p-3>

But my appeal has been continually ignored -- despite the supposed USDOT commitment to [global harmonization](#) of vehicle safety standards.

I brought FUP up again in my presentation at the November 15 ACUP meeting: <https://usdot.zoomgov.com/rec/play/1FGcVBeqz8UWd-NQsf1fmC1T4Uw0oha4qeMu8ydbd3T6908NFC0o7TSohIBXGszCECuTbnnrEQKwhdj.owTFY9aXOhuT4XQ2?startTime=1700069482000> at 2:29:13 and responded to a question about FUP from Dan Horvath (ATA) at 2:30:56.

I have attached a Research Needs Statement which I drafted for the TRB in 2020 (I don't remember if it was ever discussed or published), as well as a Petition to the Secretary in June 2022 for FUP rulemaking. **When will NHTSA research this safety hazard and issue a decision on those petitions (2014 and 2022)?**

Marianne

p.s. Note NTSB FUP recommendations:

- [NTSB Recommended FRONT OVERRIDE PROTECTION In 2010 after Truck OVERRODE 3 vehicles](#)
- [NTSB Truck Underride Safety Recommendations to NHTSA Safety Recommendation H-10-013, Issue Date: 10/21/2010](#)

p.p.s. Note that this representative from Volvo Trucks confirms that it will likely take a mandate before they put FUP on American trucks (despite the fact that they put it on trucks sold in other countries with a FUP regulation): [MANDATE for Front Underride Protection](#)

----- Forwarded message -----

From: Marianne Karth <mariannekarth@gmail.com>

Date: Wed, Nov 29, 2023 at 10:39 AM

Subject: Troopers release video showing aftermath of fiery Ohio bus crash that killed 6

To: Molloy Robert <molloyr@ntsb.gov>

Cc: Erik Strickland <Erik.strickland@ntsb.gov>, Shaw Stephanie <stephanie.shaw@ntsb.gov>, Jerry <jkarth1@yahoo.com>

Rob,

**Was underride/override investigated in the Ohio bus/semi/SUV crash?** Could Front Override/Underride Protection have changed the outcome?

*The semi from Hebron, Ohio, then hit the Pioneer Trails bus after “overriding” the Nissan Murano, the crash report explains.* <https://www.fox19.com/2023/11/28/crash-report-details-new-information-ohio-crash-that-killed-3-students-3-adults/>



Troopers release video showing aftermath of fiery Ohio bus crash that killed 6

Victims: Report reveals details of fatal bus crash that killed Ohio students, adults

My posts:

- [How Underride Protection Could Prevent Fiery Crashes & Make Truck Crashes More Survivable](#)
- [Major truck manufacturers have Front Underride Protection designs which can work on American trucks.](#)
- [Guest Post: IIHS Research Provides Foundation for Traffic Safety Legislation – Including Underride](#)

Marianne

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## 6 attachments

### Front Underride Protection

The UNECE, as well as many countries, recognized the known safety hazard from collisions with the front of large trucks resulting in death and significant injuries and, subsequently, adopted a Front Underride Protection Standard.





NHTSA has not harmonized U.S. standards, on front bumpers for commercial motor vehicles, with those of other countries or regions, pursuant to federal law.

NHTSA should provide ACUP with information pertaining to the reasons it has not harmonized U.S. standards.

**Front Underride Protection Slide.jpg**  
164K



**Volvo Front Override Crash Photo.jpg**  
1367K

-  **Front Underride Protection Study TRB Research Needs Statement.pdf**  
125K
-  **Petition for U.S. Harmonization With Global Front Underride Protection Standard.docx (1).pdf**  
233K
-  **2017 Friedman et al Heavy Truck front end deployable system opportunities IJCRASH (1).pdf**  
1179K
-  **IIHS Status Report on Front Underride Protection August 26 1989.pdf**  
2346K