

21 July 2023

Jennifer N. Dang
Division Chief, New Car Assessment Program, Office of Crashworthiness Standards
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590-0001

Re: Docket No. DOT-NHTSA-2023-0020

Dear Division Chief Dang,

Thank you for the opportunity to provide feedback on this docket, pertaining to a Request for Comments on the proposed update to the National Highway Traffic Safety Administration's (NHTSA) New Car Assessment Program (NCAP). This conversation is critical to the safety of everybody who uses a vehicle in the United States and the vitality of the communities that they live in.

We echo the sentiments shared by the National Association of City Transportation Officials (NACTO), for USDOT and NHTSA's acknowledgement of the role that vehicle design plays in our pedestrian safety crisis. However, we are concerned that the proposed NCAP update will be inadequate to meet USDOT's goal of zero deaths on American roadways.

We support and reiterate the following comments from NACTO:

- Any vehicle that receives a failing grade for pedestrian crashworthiness should be ineligible for a 5-star rating.
- Adopt a 5-star scoring system for pedestrian crashworthiness, rather than a pass/fail system.
- Consider evaluating pedestrian crashworthiness at speeds higher than 25 mph in addition to at or below 25 mph.
- Incorporate information about other vehicle safety features that are proven to protect people outside of vehicles into the rating system, and ensure no vehicle receives a 5-star rating if it doesn't include those features.

By not sharing information with consumers, pursuing insufficiently robust crashworthiness standards, and not requiring the most advanced safety features for new cars, NHTSA will perpetuate this status quo where several thousand people walking and rolling die on our streets and roads annually because they are afterthoughts. We look forward to engaging in the conversation with your team in order to achieve a transportation system where these fatalities do not occur. Thank you for your consideration of this feedback.



Beth Osborne
Director, Transportation for America



Benito Pérez
Policy Director, Transportation for America