

July 23, 2024

Sophie Shulman  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Dear Deputy Administrator Shulman:

The undersigned support the final rule issued by the National Highway Traffic Safety Administration (NHTSA) to require automatic emergency braking (AEB) with pedestrian detection on light vehicles.<sup>i</sup>

According to NHTSA, requiring AEB on light vehicles will save hundreds of lives and prevent thousands of injuries annually at a time when the carnage and expense borne from crashes on our roadways are at historic highs. On average, 116 people were killed every day on roads in the U.S. in 2022, totaling just over 42,500 fatalities.<sup>ii</sup> An additional 2.38 million people were injured.<sup>iii</sup> This represents a 29 percent increase in deaths in just a decade.<sup>iv</sup> Early projections for 2023 traffic fatalities remain at a similar level.<sup>v</sup>

This rule is the most impactful regulation for roadway safety issued by NHTSA in years. The effectiveness of AEB is indisputable. In fact, the Insurance Institute for Highway Safety (IIHS) has found that these safety systems have the capability to reduce car front-to-rear crashes with injuries by 56 percent.<sup>vi</sup> Moreover, this technology is already available in many vehicles, and the rule provides a lengthy compliance period of five years.

Congress required NHTSA to promulgate this regulation in the bipartisan Infrastructure Investment and Jobs Act enacted in 2021.<sup>vii</sup> In response, the agency engaged in a thorough and thoughtful multi-year rulemaking that resulted in a Federal Motor Vehicle Safety Standard that meets all statutory commands. This regulation should be implemented without delay, or preventable crashes will occur, and people will needlessly be killed or injured on our nation's roadways. As such, we urge NHTSA to deny in its entirety the petition for reconsideration of the final rule recently filed by the Alliance for Automotive Innovation.<sup>viii</sup>

Sincerely,

Advocates for Highway and Auto Safety  
Allstate Insurance Company  
American Family Insurance  
American Public Health Association  
America Walks  
Amica Mutual Insurance Company  
Center for Auto Safety  
Citizens for Reliable and Safe Highways  
Consumer Federation of America  
Consumers for Auto Reliability and Safety  
Emergency Nurses Association

Families for Safe Streets  
Farmers Insurance  
FIA Foundation  
Independent Insurance Agents & Brokers of America  
Kids and Car Safety  
League of American Bicyclists  
Liberty Mutual Insurance  
Mothers Against Drunk Driving  
National Association of City Transportation Officials  
National Association of Mutual Insurance Companies  
National Coalition For Safer Roads  
National Safety Council  
Nationwide Mutual Insurance Company  
NJM Insurance Group  
Parents Against Tired Truckers  
Selective Insurance Company of America  
Society for the Advancement of Violence & Injury Research  
Towing and Recovery Association of America  
Transportation for America  
Trauma Foundation  
Truck Safety Coalition  
Vision Zero Network  
Whirlwind Wheelchair International

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<sup>i</sup> 89 FR 39686 (May 9, 2024).

<sup>ii</sup> Overview of Motor Vehicle Traffic Crashes in 2022, NHTSA, Apr. 2024, DOT HS 813 560. (Overview 2022).

<sup>iii</sup> Overview 2022.

<sup>iv</sup> Traffic Safety Facts 2021: A Compilation of Motor Vehicle Crash Data, NHTSA, Dec. 2023, DOT HS 813 527, (Annual Report 2021); and Overview 2022; [comparing 2013 to 2022].

<sup>v</sup> Traffic Safety Facts: Crash Stats, Early Estimate of Motor Vehicle Traffic Fatalities in 2023, NHTSA, Apr. 2024, DOT HS 813 561.

<sup>vi</sup> IIHS, Real World Benefits of Crash Avoidance Technologies (Dec. 2020).

<sup>vii</sup> Pub. L. 117-58, § 24208 (2021).

<sup>viii</sup> Document ID: NHTSA-2023-0021-1071.