February 21, 2014

The Honorable David J. Friedman
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Request for Comments; National Highway Traffic Safety Administration, 2014-2018 Strategic Plan;
Docket No. NHTSA-2014-0014

Dear Acting Administrator Friedman:

The Insurance Institute for Highway Safety (IIHS) welcomes the opportunity to comment on the National Highway Traffic Safety Administration’s (NHTSA) strategic plan for 2014-18. Because the plan will not be presented until the public meeting on February 24, we have looked to the draft strategic plan for the U.S. Department of Transportation (DOT) to understand NHTSA’s priorities in the coming years. Several effective interventions were noticeably absent from the DOT plan, and we urge NHTSA not to ignore these opportunities to improve transportation safety.

Motorcyclist deaths have increased steadily since 1998, and this trend did not experience as sharp a decline associated with the recession as did deaths in other motor vehicles. In 2012, 4,666 motorcyclists died, more than twice the number in 1997. We agree with DOT and NHTSA about the importance of motorcycle helmets and DOT certification to ensure that helmets provide adequate protection. Thus we support the agency’s efforts to educate motorcyclists about the importance of DOT certification.

However, an arguably bigger problem is the large number of motorcyclists who choose not to wear helmets at all. States increasingly are allowing motorcyclists to ride without helmets. Only 19 states and the District of Columbia require helmets for riders of all ages. DOT and NHTSA should be at the forefront in supporting universal helmet laws by working with states to disseminate information on the proven effectiveness of universal helmet laws in increasing helmet use and reducing injuries and deaths.

Another proven countermeasure for motorcycle crashes and deaths is antilock braking systems (ABS). Research from IIHS (Teoh, 2011, 2013) and the Highway Loss Data Institute (2009, 2013) shows that ABS reduces fatality rates as well as insurance claims for motorcycle crash damage and injuries. Based on this and other research from around the world, IIHS petitioned NHTSA to require ABS on all motorcycles sold in the United States (Docket No. NHTSA-2009-0108-0034). This not only would reduce the injuries and deaths associated with motorcycle riding but also harmonize motorcycle regulations with those in Europe, where ABS will be required for all on-highway motorcycles with an engine displacement greater than 125 cc beginning in 2016. It is time for NHTSA also to implement this effective countermeasure for motorcycle crashes, and we hope it is part of the agency’s strategic plan.

IIHS commends DOT’s commitment to reducing alcohol-impaired driving and increasing seat belt use. We estimate that more than 7,000 people would have survived in 2012 if all drivers had had blood alcohol concentrations (BAC) below the legal limit. Similarly more than 3,000 would have survived if everyone had buckled up. The DOT strategic plan mentions further exploring in-vehicle technologies to prevent driving with illegal BACs, and we know NHTSA supports the Driver Alcohol Detection System for Safety project, which aims to hasten the development of technology that could be more widely used. However, there is no mention of efforts to explore in-vehicle technologies to increase belt use. The Moving Ahead for Progress in the 21st Century Act (MAP-21) relaxed an earlier prohibition against requiring more aggressive seat belt reminders. We think NHTSA’s strategy to increase belt use should take advantage of this change by developing safety standards requiring more effective seat belt reminder systems.
One of NHTSA’s important contributions to the downward trend in highway fatalities has been the promulgation of safety standards addressing vehicle crashworthiness. In 2012, the driver death rate in vehicles 1-3 years old was only 37 percent of what it was at the start of the 21st century, and this reduction is due in part to improved crashworthiness. We notice that the DOT strategic plan does not mention efforts to improve vehicle crashworthiness despite research from both IIHS (Brumbelow and Zuby, 2009) and NHTSA (Bean et al., 2009) that identifies areas for further improvement. We hope that crashworthiness improvements continue to be part of NHTSA’s strategy to reduce injuries and deaths in vehicle crashes, even as new crash avoidance technologies offer new opportunities.

Finally, we urge NHTSA to continue efforts to encourage automated enforcement of traffic laws. The body of research evidence suggests that photo enforcement of traffic-light-controlled intersections and speed limits is effective in preventing these violations, which contribute to many crashes, and saves lives, as well. A recent IIHS study (Hu et al., 2011) found that if red light cameras had been in place during 2004-08 in all 99 U.S. cities with populations of more than 200,000, a total of 815 deaths could have been avoided. Unfortunately, many state and local debates about whether to permit automated enforcement are tainted by considerable misinformation about its effectiveness. NHTSA, through its Driving Safety programs, could encourage state and local authorities to choose automated enforcement by promoting information about its effectiveness.

We hope NHTSA finds our suggestions for its 2014-18 strategic plan useful and anticipate continued efforts with the agency to reduce the annual toll of motor vehicle crashes on our nation’s roads.

Sincerely,

David S. Zuby
Executive Vice President, Chief Research Officer

References


