

March 29, 2021

The Honorable Maria Cantwell
Chair
Committee on Commerce, Science, and
Transportation
United States Senate

The Honorable Roger Wicker
Ranking Member
Committee on Commerce, Science, and
Transportation
United States Senate

The Honorable Peter DeFazio
Chair
Committee on Transportation and
Infrastructure
United States House of Representatives

data or research, nor do they contemplate a full and complete examination of the associated costs and benefits. In recent years, several federal agencies have reached similar conclusions, noting additional research is needed on the overall effectiveness, costs, and real-world operational impacts of underride guards. NHTSA initiated a rulemaking in 2015 proposing revisions to the Federal Motor Vehicle Safety Standards that address rear impact guards.¹ The Agency is still evaluating research data and reviewing public comments received in response to its proposal, which will be critical in answering some of the questions raised by the proposed legislation. Also, in 2015 NHTSA released an advance notice of proposed rulemaking relating to rear underride guards for single-unit trucks; however, the proposal was subsequently withdrawn with NHTSA stating that “the changes considered in the ANPRM are not justified.”² As NHTSA examines the potential benefits and challenges associated with underride guards, we believe the Agency should be permitted to complete its due diligence, unencumbered by external pressures such as a legislative mandate. In addition, only after an underride guard system has been designed and tested, can a proper risk/benefit analysis be conducted to evaluate whether safety goals can be met. These uncertainties must be addressed before Congress considers implementing statutory requirements.

of conducting an updated Large Truck Crash Causal Factors Study. ~~By 00/07/14 (e) 519 58 (r) 072 (FD) 0.5y(~~

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