Ann Carlson, Acting Administrator

Jennifer N. Dang, Division Chief, NCAP, Office of Crashworthiness Standards

National Highway Traffic Safety Administration

US Department of Transportation

1200 New Jersey Avenue S.E.

Washington, D.C. 20590

Dear Acting Administrator Carlson and Division Chief Dang,

On behalf of [city/agency/organization name], we are pleased to offer the following comments in response to NHTSA’s proposed updates to the New Car Assessment Program (NCAP).

[Information about your city/organization and connections to NCAP and vehicle safety (e.g. serious injury / fatality numbers, local commitments to Vision Zero, safer vehicle fleets, consumer education, etc.) ]

[City/organization] supports NACTO’s comments in response to NHTSA’s Request for Comments on proposed updates to the New Car Assessment Program (NCAP). As noted in the [National Roadway Safety Strategy](https://www.transportation.gov/NRSS/SafeSystem), the Safe System Approach calls not only for safer people and safer roads, but also explicitly for **Safer Vehicles** with “[systems and features that help to prevent crashes and minimize the impact of crashes on both occupants and non-occupants](https://www.transportation.gov/sites/dot.gov/files/2023-02/2023-Progress-Report-National-Roadway-Safety-Strategy.pdf).” However, while NHTSA’s proposed updates to NCAP signal that the Administration has heard our calls to evaluate vehicles based on how well they perform once they are in a crash with a pedestrian, it fails to create any change in how vehicles are rated, thereby continuing to leave consumers in the dark about the vehicles they are purchasing.

Strengthening NCAP by mandating pedestrian crashworthiness, factoring those tests into NHTSA’s overall vehicle safety ratings, and clearly sharing that information with consumers is critical for saving lives and making streets safer for all people. We support the detailed comments that NACTO submits in its letter.

Specifically, [city/organization] urges NHTSA to strengthen NCAP by doing the following:

**1. Provide consumers with transparent information about how well a vehicle performs on the pedestrian crashworthiness test**

* Any vehicle that receives a failing grade for pedestrian crashworthiness should be ineligible for an overall 5-star vehicle safety rating.
* Adopt a 5-star scoring system for pedestrian crashworthiness, rather than a pass/fail system.
* Compare vehicles across weights and classes to reflect the disproportionate risk that height and weight pose in crashes with people outside of the vehicle.
* Maintain crash test consistency by having NHTSA conduct the crashworthiness test, rather than allowing manufacturers to conduct the test and self-report results.
* Incorporate the results of the pedestrian crashworthiness test on the Monroney Label.

**2. Adopt additional components into the pedestrian crash worthiness test to account for a broader range of road users and likely crash scenarios.**

* Consider evaluating pedestrian crashworthiness at speeds higher than 25 mph in addition to at or below 25 mph.
* Incorporate people on bikes into the pedestrian crashworthiness test.

**3. Incorporate information about other vehicle safety features–like ADAS and direct vision–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.**

* Evaluate Advanced Driver Assistance Systems (ADAS) features based on their ability to sense and protect people outside of vehicles.
* Evaluate a vehicle’s Direct Visibility from the driver’s seat (also known as “direct vision”).

**4.**  *[Insert other specific actions from* [*NACTO’s comments*](https://nacto.org/wp-content/uploads/2023/07/NACTO_NCAP_Letter_Jul-2023.pdf) *that would most help your priorities]*

[City/organization] is glad to see that NHTSA is proposing the inclusion of an optional pedestrian crash worthiness test within NCAP to provide consumers with better information about how their vehicles impact pedestrian safety. However, NHTSA’s inclusion of a pedestrian crashworthiness test can make a more meaningful impact on pedestrian safety if these tests are made mandatory, if the results factor into the overall vehicle safety ratings, and if consumers are given access to that information at the point of sale. We look forward to seeing updates to vehicle safety standards and reporting that will continue to achieve similar goals.

[SIGNATURE]  
[Name]  
[Title]  
[City/Organization]