

DEMOCRATIC WOMEN'S CAUCUS

October 1, 2024

Sophie Shulman
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington DC, 20590

Dear Acting Administrator Shulman,

As members of the Democratic Women's Caucus, we write to thank you for your attention to the issue of gender disparities in traffic injuries. This is an underrecognized issue within transportation safety, but it is one with considerable consequence. We previously sent a letter to U.S. Department of Transportation Secretary Pete Buttigieg regarding this issue in February 2022. We were pleased to see the National Highway Traffic Safety Administration (NHTSA) agree to all recommendations made by the U.S. Government Accountability Office to improve safety data, and we urge you to take further decisive action to better protect women and girls.

As NHTSA's research has shown, the chance of fatality for women is, on average, 17% higher than men in a car crash.¹ Further, it was found that women have a 73% greater chance of being seriously injured.² While we understand that there are varying factors that contribute to this disparity, the use of crash test dummies in the New Car Assessment Program (NCAP) do not mitigate these risks or address this large inequity.³

Using crash test dummies that accurately reflect the average woman strategically in safety tests, such as in the driver's seat for frontal and side barrier crash tests, has successfully resulted in improved safety outcomes.^{4 5} Updating crash test dummies used in the NCAP from the Hybrid III 5th Percentile Female dummy (HIII-05F) to the THOR 5th Percentile Female dummy (THOR-05F) can make a major difference in this disparity, as this model has improved injury measurement capabilities.⁶

¹ (Kahane, Injury Vulnerability and Effectiveness of Occupant Protection Technologies for Older Occupants and Women, 2013)

² (Samarrai, Study: New Cars Are Safer, But Women Most Likely to Suffer Injury, 2019)

³ (Repko, Vehicle Safety: DOT Should Take Additional Action to Improve the Information Obtained from Crash Test Dummies, 2023)

⁴ (Linder & Svedberg, Review of Average Sized Male and Female Occupant Models in European Regulatory Safety Assessment Tests and European Laws: Gaps and Bridging Suggestions, 2019)

⁵ (Stanford University, Inclusive Crash Test Dummies: Rethinking Standards and Reference Models, 2021)

⁶ (NHTSA Advanced Anthropomorphic Test Devices Development and Implementation Plan, 2024)

As you work towards reducing demographic inequities in crash outcomes, we greatly anticipate your Notice of Proposed Rulemaking to implement the THOR-F5 into federal standards. We urge you to begin the use of the THOR-5F in the NCAP in the same capacity and regularity as its counterpart, particularly in the driver's seat. Further, we ask you to consider using the WorldSid 5th Percentile Female crash test dummy to enhance side-impact data and safety improvements.

Thank you again for your commitment to advancing vehicle safety. We look forward to partnering with you on this and making the road safer for women drivers and passengers.

Sincerely,



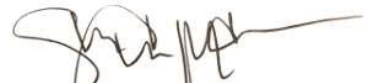
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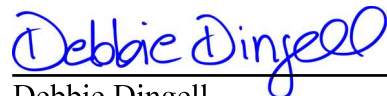
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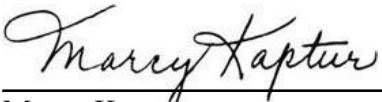
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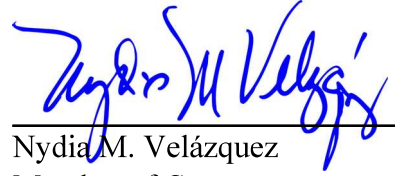
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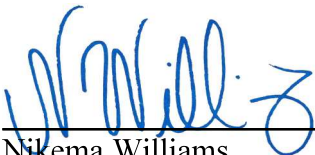
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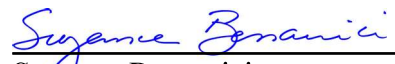
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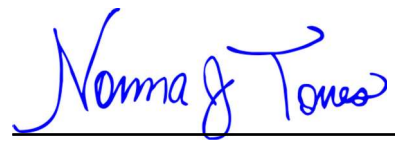
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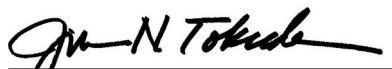
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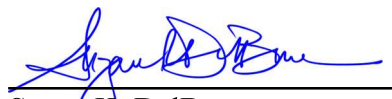
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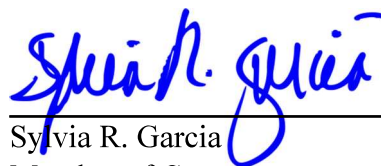
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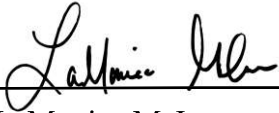
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