

December 14, 2021

Secretary Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Secretary Buttigieg,

We recognize the level of importance this Administration and Congress have placed on the topic of diversity, equity, and inclusion. It could be argued that our nation has never been this focused on undoing inequities than any other time in modern history. Today, we are writing to you for your consideration on addressing an often-overlooked inequity in the area of vehicle crash testing and the surrounding safety standards.

Government standards for vehicle crash testing are outdated and unequal, causing thousands of women to be needlessly killed and injured every year. This deadly gender bias in vehicle safety is unacceptable. It is time to stop studying this issue and fix it – now.

Females are not just smaller versions of males. Due to differences in physiology and driver positioning, women's and men's bodies behave differently in a crash.

But our government does not equitably account for these differences, either in design regulations (Federal Motor Vehicle Safety Standards, or FMVSS) or voluntary 5-star safety ratings (the New Car Assessment Program, known as NCAP). As a result of this government-supported bias in design, women die and are more at risk of serious injury in a crash than men.

The National Highway Traffic Safety Administration (NHTSA) – the agency that creates and oversees FMVSS and NCAP ratings – has been in possession of data for years that show women are 17%-18.5% more likely to die in a vehicle crash than men.

That means up to 1,342 women are needlessly dying every year. But while crash test dummy manufacturers have created technologies that could make vehicles safer for women and other under-represented groups, neither the FMVSS nor NCAP have been updated to reflect advancements that would bring equality to vehicle design.

NHTSA's current NCAP 5-star rating voluntary crash test regime does not require testing female dummies in the driver's seat. Instead, a dummy derived from the measurements of a 1970s average-sized male is used. Women are significantly more prone to whiplash in a crash. Relative to males of the same age, females in deadly crashes were 9.4% more likely to die as a result of neck injury. And differences are exacerbated when women become pregnant – for instance, standard seatbelts do not fit more than sixty percent of third-trimester pregnant women.

We are asking for the following legislative and regulatory changes:

1. **NHTSA should immediately update NCAP.** By using outdated and male-centric crash-test dummies and by limiting the scope of testing of NCAP, NHTSA allows – according to its own research – over 1300 women to be killed every year. NHTSA has the regulatory authority to update NCAP today. NCAP should:
 - a. Immediately transition to the latest generation of crash test dummy technology for both male and female occupants.
 - b. Require all tests use the most up-to-date male and female technology in the driver and passenger seat tests to ensure equitable testing which will help close the safety gap for women and other vulnerable groups.

2. **NHTSA should update FMVSS standards** to use the most advanced generation of technology and ensure equitable testing of the most biofidelic female and male dummies in all FMVSS crash test positions, thereby reducing injuries most prevalent in women, young adults, and elderly occupants.
3. **Congress should create a structure that commits NHTSA to reviewing the crash test landscape regularly** with the intent of implementing the latest crash test technologies, so that we never fall behind again.

Women and other vulnerable populations have waited long enough. It is time to stop studying this issue to death. Let this be the year we turn words into action, update vehicle crash test standards, and save those who should have been treated equally all along.

Sincerely,

Beth Brooke

Co-Chair, VERITY Now

Former Global Vice Chair of Public Policy for EY; Forbes “*World’s 100 Most Powerful Women*”

The Honorable Susan Molinari

Co-Chair, VERITY Now; Former Member of U.S. Congress (R-NY)

The Honorable Olympia Snowe

Former United States Senator (R-ME)

The Honorable Mary L. Landrieu

Former United States Senator (D-LA)

The Honorable Heidi Heitkamp

Former United States Senator (D-ND)

The Honorable Charles Boustany

Former Member of U.S. Congress (R-LA)

The Honorable Dan Glickman

Former Secretary of Agriculture, Former Member of U.S. Congress, senior fellow, Bipartisan Policy Center (D-KS)

The Honorable Richard Swett

Former Ambassador to Denmark, Former Member of U.S. Congress (D-NH)

The Honorable Barbara Comstock

Former Member of U.S. Congress (R-VA)

The Honorable Chris Shays

Former Member of U.S. Congress (R-CT)

The Honorable Don Bonker

Former Member of U.S. Congress (D-WA)

The Honorable Constance Morella

Former Member of U.S. Congress (R-MD); U.S. ambassador to the Organisation for Economic Co-operation and Development (OECD)

The Honorable Bob Inglis

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The Honorable Cliff Stearns

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