

## **Truck Underride: A Vision Zero Plan for the Best Possible Protection**

It is a common business practice to develop a Vision Statement which exemplifies the goals of the organization and which will direct its decisions, practices, and activities.

Let me give an example of this. Our family helped to develop a Vision Statement for Family Promise of Midland, Texas: *End Homelessness, One Family at a Time*. Will there ever be zero homeless families? Probably not. But that vision is what we aimed for; it guided our steps.

What can a vision statement do? It can, “encourage strategic thinking and help organizations share concise information about their plans and progress toward impact “

<https://www.guidestar.org/report/chartingimpact/650820583/family-promise-midland-texas.pdf> & [http://www.midlandvolunteerconnections.org/agency/detail/?agency\\_id=42248](http://www.midlandvolunteerconnections.org/agency/detail/?agency_id=42248)

Similarly, *Vision Zero: Reduce Crash Deaths & Serious Injuries* is a vision statement that serves to move us ever closer to ending preventable, senseless and tragic crash deaths & serious injuries—one crash at a time. That vision guides our steps to discover and implement proven means to save lives—to make saving human life a priority over saving money.

Specifically, we have chosen to advocate for resolution of a problem which has too-long been ignored: truck underride crashes. It is well-known that the current underride guard standards are inadequate; they result in guards that are weak and ineffective and all-too-often lead to tragic deaths and horrific injuries. The really bad thing about this is that many people have already taken the time to prove that this situation is unnecessary and that better protection is possible.

Therefore this is what I am asking for as a Vision Zero strategic application:

We have spent a lot of time reflecting on the inadequacy of current rear-impact guards to prevent underride by passenger vehicles along with the concomitant difficulty of holding trailer manufacturers accountable for the horrific injuries and deaths which all-too-often occur as a result. The victim/family is left to bear the burden of the outcome.

The current means of regulating the manufacture of underride guards requires the trailer manufacturer to design its underride guards to meet certain specifications. Once the manufacturer has met those requirements, then, currently, it cannot normally be held liable for any failure of the guard to withstand a crash--along with any resultant property damages, injuries, or death.

We would like to propose a change in the approach to regulating truck underride guards. We are requesting/recommending that the manufacturer be required to design and crash test a guard which would withstand a crash at any speed up to 50 mph and at any point along the back of the trailer. It has been documented through research and crash tests that this level of protection is possible.

Furthermore, we are requesting that, when a real-life underride crash does occur with one of their trucks, the manufacturer &/or truck owner be held financially responsible for the cost of a thorough crash reconstruction, which would identify--at minimum--the speed which was traveled and whether the guard gave way with the impact of the crash.

With this new approach to regulating underride guards, the manufacturer/owner would thereby be accountable for any failure of the guard to withstand a crash and thus be held responsible for ensuring a very important public outcome: prevention of horrific injuries and deaths due to underride crashes.

This is in sharp contrast to the current situation where no penalty is normally paid for a failed underride guard--except by the victims and their loved ones.

p.s. This link provides a perspective on prevention of crash fatalities as a public health outcome (although it does not mention truck safety issues in particular):

<http://www.who.int/mediacentre/factsheets/fs358/en/> and see, also: <http://www-nrd.nhtsa.dot.gov/Pubs/811181.pdf>

p.p.s. We do not pretend to be experts on details such as whether 50 mph is the most appropriate speed limit to require. (Although we know that others have such expertise.) We do know, however, that requiring manufacturers to prevent crashes only at lower speeds inevitably means that many lives will be unnecessarily lost--placing a low value on human life. Corporate gain over tragic, preventable, and irrevocable loss of life.

p.p.p.s. Additionally, we have been told that this level of protection is highly possible and we are taking steps to encourage further research on this in the near future.

p.p.p.p.s. Oh, and did I ask for a requirement to install not only rear underride guards but to likewise protect people from side and front underride collisions on all new trucks, as well as retrofitting existing trucks? Act now to make a **comprehensive** safety regulation in a timely and decisive manner. Why wait?

To not provide the best possible protection, and thereby sentence countless people to Preventable Death by Motor Vehicle, is ethically and morally unconscionable and unthinkable.

Marianne Karth,  
The Survivor of a truck crash  
which resulted in rear underride  
and Passenger Compartment Intrusion (PCI)  
into the back seat of her Crown Victoria  
where AnnaLeah (17) and Mary (13) met their untimely end, May 4, 2013

Website in memory of AnnaLeah & Mary: <http://annaleahmary.com/>

My Public Comment on Single Unit Trucks: [http://www.regulations.gov/#!  
documentDetail;D=NHTSA-2015-0070-0018](http://www.regulations.gov/#!documentDetail;D=NHTSA-2015-0070-0018)

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**Underride guard posts can be found at this site:**

- [Underride Guard Page @ annaleahmary.com](http://annaleahmary.com/underride-guards/) : <http://annaleahmary.com/underride-guards/>
- [Underride Guard posts @ annaleahmary.com](http://annaleahmary.com/tag/underride-guards/) : <http://annaleahmary.com/tag/underride-guards/>



*Mary & AnnaLeah in our Crown Victoria (our safest car ever), sitting in stopped traffic on an Indiana expressway for a fatal crash some ways ahead of us in October 2012—less than a year before their last car ride on May 4, 2013.*

