Petition to Secretary Chao for Supplemental Comprehensive Underride Rulemaking

Based on decades of <u>research and recommendations</u>, we are urging the DOT to move forward without further delay and issue Supplemental Underride Rulemaking, which should include everything in the <u>HR.2 Underride Section</u>, including an Advisory Committee on Underride Protection. In addition, in order to fill in the glaring gaps in HR.2, we are requesting that the DOT complete three specific studies:

- 4. A <u>Side Guard Pilot Program</u>, which will fulfill the HR.2 requirements to conduct "additional research." It is designed in such a way as to, once and for all, address the industry concerns about side guards, so that you can move forward with the development of a side guard standard.
- 5. A <u>Single Unit (Straight or Box) Truck Study</u>. This is important because people, like <u>David</u> <u>Aguilar and Jorge Acosta-Flores</u>, continue to die under these kinds of trucks as well as trailers.
- 6. A <u>Front Underride Protection study</u>. This is important because people continue to die in head-on collisions and when trucks rear-end their passenger vehicle. It is time to have a conversation in this country about a problem which other countries have decided warrants a <u>FUP standard</u> and who have developed <u>FUP technology</u>. In fact, truck manufacturers have installed it on their trucks sold overseas but not on their trucks sold in the U.S.

Secretary Chao, you have the authority to transform the existing rear guard <u>NPRM</u> into a <u>SNPRM</u> in order to enable us to move forward with a sense of urgency to bring about an end to preventable truck underride tragedies. We are asking you to act now to protect vulnerable travelers -- brothers & sisters, mothers & fathers, daughters & sons, friends & neighbors.

July 15, 2020