

May 25, 2022

Pete Buttigieg, Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

Steven Cliff, Acting Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

Dear Secretary Buttigieg and Dr Cliff:

In March 2022, the Office of the Secretary, U.S. Department of Transportation, revised the document entitled, "[Benefit-Cost Analysis Guidance for Discretionary Grant Programs](#)." This revised guidance updates the Value of Statistical Life and monetized values for Injury and Fatal Crashes. Consequently, these updates were used to revise the attached report (and the associated Excel Spreadsheet) entitled, "Using Cost-Benefit Analysis to Evaluate the Economic and Societal Benefits of Side Underride Guards for Semi-Trailers". To place this Cost-Benefit Analysis in context, we note that underride provisions were included in the bipartisan Infrastructure Investment and Jobs Act (IIJA, P.L. 117-58), and members of Congress are closely tracking their implementation (see attached Congressional Inquiry).

This revised cost-benefit analysis estimates the economic effects of implementing a regulation mandating side underride guards on new semi-trailers to evaluate the estimated benefits from a reduction of fatalities and serious injuries in relation to the costs of the guards. The cumulative 15-year societal benefits of installing side underride guards on new semi-trailers would save at least 3,560 lives and prevent 35,598 serious injuries. The cost of guards would be fully offset by the estimated benefits, providing a minimum annual Net Present Value of \$53,057,724,800 to \$79,238,494,800. A regulation for side underride guards is considered cost effective because the public safety benefits from installing side underride guards on semi-trailers substantially outweigh the costs.

We appreciate your consideration of this information in future rulemakings on side underride guards and in fulfilling your legally-required and long overdue responses to the following under the Administrative Procedures Act:

1. The May 5, 2014 petition from Marianne and Jerry Karth and the Truck Safety Coalition to improve rear underride, side underride guards, and front override guards; and
2. Our September 14, 2021 petition to promptly initiate an investigation into semitrailers and single-unit trucks because of a known safety defect from collisions with passenger vehicles and other vulnerable road users (pedestrians, bicyclists, or motorcyclists) resulting in death and significant injuries due to a lack of side underride guards.

We strongly believe that NHTSA should adhere to your mission: "...to **save lives, prevent injuries, and reduce economic costs due to road traffic crashes**, through education, research,

safety standards, and enforcement.” Please enact a regulation for side underride guards to prevent further deaths and serious injuries because of the failure of the trucking industry to address this issue.

Thank you,

Eric Hein, Marianne and Jerry Karth, and Lois Durso

Enclosures (3): Cost-Benefit Analysis Report, Excel Spreadsheet, Congressional Inquiry

Cc:

Mohsin Syed  
R. Ryan Posten  
Stephen Ridella  
Representative Earl Blumenauer  
Representative David Price  
Representative Cohen  
Representative DeSaulnier  
Representative DeFazio  
Representative Carson  
Representative Cartwright  
Representative Chu  
Representative Espallat  
Representative Garamendi  
Representative García  
Representative Nadler  
Representative Holmes Norton  
Representative Schakowsky  
Senator Ron Wyden  
Senator Jeff Merkley  
Senator Richard Burr  
Senator Gillibrand  
Senator Heinrich  
Senator Luján  
Senator Duckworth  
Senator Blumenthal  
Senator Feinstein  
Senator Markey  
Senator Peters  
Senator Schumer  
Senator Van Hollen  
Senator Warren  
Institute for Safer Trucking

