Question	Comments	
1. The injury target population was obtained by reviewing crash data and estimating side underride underreporting in FARS through PCR reviews. We seek comment on the estimated injury target population resulting from underride crashes with PCI into the side of trailers.		
2. The agency assumed side underride guard effectiveness of 97 percent for fatalities and 85 percent for serious injuries in light vehicle crashes with PCI into the sides of trailers at speeds up to 40 mph. We seek comment on this effectiveness estimate.		
3. In estimating benefits, the agency assumed that side impact guards would mitigate fatalities and injuries in light vehicle impacts with PCI into the sides of trailers at impact speeds up to 40 mph. We recognize, however, that benefits may accrue from underride crashes at speeds higher than 40 mph. We seek information on quantifying possible benefits of side impact guards in crashes at speeds above 40 mph.		
4. Are there other benefits that NHTSA has not considered that could be used to justify a mandate for side underride guards? The agency seeks information and supporting rationale concerning these additional benefits of side underride guards.		
5. In estimating benefits, NHTSA did not account for the potential effects of advanced driver assistance technologies (ADAS) which could reduce the number of crashes independently of the presence of underride guards. The agency requests data on additional factors that affect the estimated		

benefits of side underride guards on trailers and semitrailers.	
6. In estimating costs, the agency did not include the cost and weight of strengthening the beams, frame rails, and floor of the trailer to accommodate side underride guards. NHTSA seeks information on changes that would be required and the additional costs resulting from these changes.	
7. NHTSA's cost estimates were based on the AngelWing side underride guard manufactured by Airflow Deflector. NHTSA seeks relevant information on side underride guards that have been fully developed and tested and are currently available for installation on trailers in the United States.	
8. NHTSA did not take into consideration the practicability and feasibility of side underride guards on trailer and semitrailer operations. Could side underride guards scrape or snag on the road surface when the vehicle travels over humped surfaces such as a highway-rail crossing, or when the vehicle enters a steep loading dock ramp? Could this interaction of side underride guards with the ground disable movement of the trailer and significantly damage the side underride guards, thereby requiring their replacement? We seek information on the effects of side underride guards on trailer and semitrailer operations.	
9. The analysis did not account for the effects of side underride guards on port and loading dock operations and freight capacity, and the practicability and feasibility of side underride guards in intermodal operations. We seek information on the effects of side underride guards on intermodal operations.	