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Comment from Aaron Kiefer

Posted by the **National Highway Traffic Safety Administration** on Jul 20, 2023

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NHTSA has requested information on side guards that are developed and available for installation on trailers in the United States. The Safetyskirt is a device that my company, Collision Safety Consulting, has developed to prevent otherwise survivable collisions from becoming underride tragedies.

The SafetySkirt has been crash tested, in-use tested, and has been available for purchase since the beginning of 2020. The design has been continually improved since initial testing in 2015 into a lightweight, simple, and crash effective design. In addition, the Safetyskirt can be specified as an axles - forward guard as well or a full length guard that integrates with an IIHS-approved ToughGuard rear impact guard (RIG) and/or a RIG retrofit product (also available from CSC, PLLC). The full length SafetySkirt prevents underride along the full length of the trailer rearward of the landing gear. The RIG retrofit is a product that reinforces a RIG and creates crash compatibility for semitrailer rear guards that are otherwise incapable of stopping a vehicle from underriding a trailer.

-2022 crash testing confirmed SafetySkirt crash performance by 35 mph t-bone collision of a mid-sized sedan forward of the axles

-2021 crash testing confirmed 40 mph, 30% overlap testing of a mid-sized sedan into RIG reinforcement

-2023 crash testing scheduled to confirm SafetySkirt crash performance by 35 mph t-bone collision rearward of the trailer axles

-2023 crash testing scheduled to confirm SafetySkirt crash performance by 45 mph t-bone collision forward of the trailer axles

Wabash, Vanguard, and possibly other OEM manufacturers have received side guard patents for systems that also extend crash resistance for the full length of the trailer similar to the Safetyskirt. In addition, Batzer et al has proposed patented systems to prevent underride from occurring in collisions rearward of the trailer

axles.

NHTSA should require guarding around the complete periphery of the open area presented by a semitrailer. It is feasible from economic and engineering standpoints and it is essential from the perspective of preventing otherwise survivable collisions from becoming fatal underride crashes. Regulating crash compatibility among all vehicles that share our roadways is feasible and reasonable.

Decades of passenger vehicle safety engineering (and billions of dollars of safety investment) is defeated in every underride crash. Unfortunately, there is still no crash compatibility between a semitrailer and a passenger vehicle though underride has been a known hazard since the 1950s. Enclosed please find photographs of Safetyskirt systems as well as crash data (EDR) from collision testing. Additional details regarding the products are at www.TrailerGuards.com.

Attachments 3



1G1ZG57B494100785_ACM_SafetySkirt Crash DC 3-2019



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1N4AL3AP5DC233567_ACM Side Crash 9-2022



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