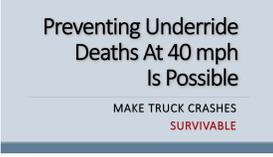
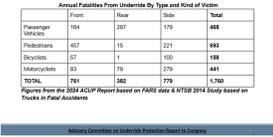
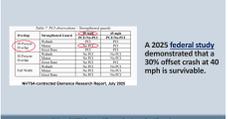


NHTSA Administrator Morrison Meeting - December 8, 2025 - MOVE THE GOAL POST

#	Slide	Presenter Notes																														
1		<p>DOT has allowed more than a generation (20 + years) to pass without advancing safety from underride dangers.</p> <p>But technology and engineering have progressed significantly.</p> <p>DOT can prevent underride deaths at 40 mph by mandating use of rear and side underride guards meeting that performance standard.</p>																														
2	 <table border="1" data-bbox="289 667 529 762"> <caption>Annual Fatalities From Underride By Type and Kind of Victim</caption> <thead> <tr> <th>Victim</th> <th>Front</th> <th>Rear</th> <th>Side</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Passenger Vehicles</td> <td>154</td> <td>287</td> <td>175</td> <td>468</td> </tr> <tr> <td>Pedestrians</td> <td>457</td> <td>15</td> <td>221</td> <td>893</td> </tr> <tr> <td>Bicyclists</td> <td>57</td> <td>1</td> <td>100</td> <td>188</td> </tr> <tr> <td>Motorcyclists</td> <td>83</td> <td>79</td> <td>279</td> <td>481</td> </tr> <tr> <td>TOTAL</td> <td>749</td> <td>382</td> <td>779</td> <td>1,930</td> </tr> </tbody> </table> <p><small>Figures from the 2024 AICUP Report based on FARS data & NTSB 2014 Study based on Trucks in Fatal Accidents</small></p>	Victim	Front	Rear	Side	Total	Passenger Vehicles	154	287	175	468	Pedestrians	457	15	221	893	Bicyclists	57	1	100	188	Motorcyclists	83	79	279	481	TOTAL	749	382	779	1,930	<p>Out of 40,000 annual traffic deaths, 4.5% are caused by underride. Underrides are especially lethal because the bottom edge of trailers stands above all of the passive safety features incorporated into passenger vehicles, e.g., crush zones, bumpers, airbag sensors, seat belt tensioners.</p> <p>When cars and large commercial motor vehicles interact, the bottom of the trailer can intrude into the occupant survival space and cause life-threatening injuries such as decapitation and crush injuries. The same risks face bicyclists, motorcyclists, and pedestrians when they get swept under large commercial trucks and get crushed by the rear wheels.</p> <p>Underride deaths cannot be eliminated by changing driver behavior or even crash avoidance technology. They can only be eliminated by the installation of physical guards, known as "impact" or "underride" guards, to the sides and rear of trailers. This is LOW HANGING FRUIT – a problem not as hard to solve as impaired or distracted driving.</p>
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3		<p>This is a recent side underride crash.</p>																														

<p>4</p>	 <p>"Scenes from a tragedy: Fatal accident in Mississippi claims 8."</p> <p>The van driver visits the crash scene one month later.</p>	<p>This is a front underride crash -- a head-on collision. Eight people died in the van. The van driver survived because the truck did not enter his survival space. CLICK, CLICK. In fact, this is the van driver visiting the crash scene one month later.</p>
<p>5</p>		<p>Vulnerable Road Users are also at lethal risk, due to the same geometric mismatch with trailers.</p> <p>Video of cyclist being run over by a truck</p>
<p>6</p>	 <p>The 2022 Rear Impact Guard Rule Was OBSOLETE The Day it Was Published:</p> <ul style="list-style-type: none"> The top RIG meets the TOUGHGUARD standard. The bottom RIG meets the 2022 Rule. <p>2017 Utility trailer 2013 Utility trailer</p> <p>VIDEO LINK</p>	<p>2022 RIG was obsolete the day it was published for THREE reasons:</p> <ol style="list-style-type: none"> 1) 94% of manufacturers already had compliant guards on the market.
<p>7</p>	 <p>30% Offset Protection Without Increased Cost or Weight</p>	<ol style="list-style-type: none"> 2) Most manufacturers made RIGs meeting the stronger TOUGHGUARD performance standard: <ol style="list-style-type: none"> a) Some sold as STANDARD b) Some as an OPTION
<p>8</p>	 <p>STOUGHTON Trailer Trailer Website</p>	<p>Stoughton is an example of a trailer manufacturer with a new guard available starting in 2016 -- at no added weight or cost to customers.</p>
<p>9</p>	 <p>Rear Impact Guard Successful in 30% Offset Crash Test At 40 mph</p> <p>NHTSA</p>	<p>Third,. But none marketed RIGs meeting a 40 mph standard, even though engineers had developed solutions to prevent underride and Passenger Compartment Intrusion at that closing speed.</p> <p>This video is from a meeting of the Advisory Committee on Underride Protection. The presenter shows a successful 30% offset RIG crash test at 40 mph.</p>
<p>10</p>	 <p>Stoughton RIG 2017 Testing At 40 mph</p> <p>NHTSA Testing 2018</p> <p>NHTSA Testing 2018</p>	<p>That same Rear Impact Guard was later tested in 2018 by NHTSA at Karco -- a testing facility in California.</p>
<p>11</p>	 <p>30% Offset Crash Test at 38 mph into a RIG Retrofit Attachment.</p>	<p>This 2020 video shows a 30% offset crash test at 38 mph into a RIG Retrofit Attachment.</p>

12		<p>A federally-funded study, published by NHTSA in 2025, demonstrated that a RIG could successfully prevent underride in a 30% offset crash at 40 mph closing speed.</p>
13		<p>In 2017, the Insurance Institute for Highway Safety successfully crash tested an AngelWing side guard at 40 mph.</p>
14		<p>In 2023, a crash test into a side guard was successful at 43 mph.</p>
15		<p>In this next video, you'll see an animation of a Right Hook crash, and two collisions - first a cyclist into a trailer without a side underride guard. CLICK The second collision with a side guard.</p>
		<p>Preventing underride deaths at 40 mph is possible.</p> <p>But it will not happen through voluntary action by trailer manufacturers.</p> <p>This is a failure of the marketplace. Government regulation is intended to correct for market failures, and you have the power to do that.</p> <p>We have been invited to demonstrate underride crash testing next year at the Southeast Commercial Motor Vehicle Safety Summit co-hosted by the FMCSA in Raleigh on August 10. We'd love to have you take advantage of this opportunity to witness firsthand the life & death difference of underride protection.</p> <p>Preventing underride deaths is not a Republican issue. It's not a Democratic issue. Neither Party has made a difference in the underride policy space. Won't you make that part of your public service legacy?</p>