

POLICY BRIEF

Peer-reviewed study finds side underride guards economically justified while NHTSA still has not proposed a safety rule

A peer-reviewed cost-benefit analysis demonstrates that the economic and safety benefits of side underride guards outweigh the costs.

Result: All modeled scenarios produced positive net economic benefits on a present-value basis, ranging from \$137 million to \$2.8 billion.

Why this matters

- Congress directed NHTSA in 2021 to assess the feasibility, benefits, and costs of side underride guards, but federal rulemaking has not advanced.
- NHTSA issued an advance notice of proposed rulemaking in April 2023, but review of public comments remains incomplete more than three years after publication.
- The findings are directly relevant to the Stop Underrides Act 2.0 bill ([S.3775/H.R.7354](#)) concerning side underride protection for new semitrailers.

\$7.4B	estimated annual societal cost of side underride
300 / 400	estimated annual fatalities and serious injuries
39	break-even threshold (lives saved equal costs)

Policy takeaway

The modeled results meet conditions identified by NHTSA and industry for side underride guard rulemaking, including economic justification and technological feasibility.

Repeated side underride crashes and multimillion-dollar verdicts and settlements increase the legal and financial risk of operating trailers without side underride guards.

Scope

The study evaluates a potential federal requirement for side underride guards on new U.S. semitrailers using a cost-benefit framework that mirrors NHTSA's cohort-scaling approach.

Source: Hein, E. (2026). Cost-benefit analysis of side underride guards for new semitrailers in the United States. *Journal of Progress in Safety & Security*, 2. DOI: [10.59490/pss.2.2026.8512](#)