

Congress of the United States
Washington, DC 20515

February 15, 2022

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Secretary Buttigieg:

We write to call your attention to an often-overlooked inequity in the area of vehicle safety: the gender-based discrepancies in traffic injuries and fatalities that are in part attributable to the absence of female crash test dummies in the current crash test system. Last year, the bipartisan *Infrastructure Investment and Jobs Act* made progress by requiring the Government Accountability Office to study the National Highway Traffic Safety Administration's (NHTSA) use of crash test dummies in vehicle safety tests and mandating that NHTSA issue a report on the subject within a year.¹ However, with the largest six-month increase ever recorded in car fatalities during the first half of 2021, it is critical that the Department of Transportation (Department) takes additional measures to protect women drivers by requiring the use of accurate, up-to-date female crash test dummies in NHTSA's New Car Assessment Program (NCAP) and Federal Motor Vehicle Safety Standards (FMVSS).²

According to NHTSA's most recent statistics, in 2019, 10,420 women died from motor vehicle crashes while another million were injured.³ Women account for more than half of all licensed drivers and are at greater risk than men of injury and death in vehicular crashes.⁴ NHTSA indicates that a female driver is 73 percent more likely than a male driver to be severely injured in a car crash and a staggering 17 percent more likely to die.^{4,5} Unfortunately, neither the FMVSS nor the NCAP have been updated to reflect advancements in crash test dummy technology that could make vehicles safer for drivers who are not represented by the types of crash test dummies currently used by NHTSA. This includes women as well as the elderly, young adults, children, and individuals of different body weights.

Equally concerning, the female dummies most commonly used by NHTSA in tests are simply scaled-down versions of the male dummies, which are based on the measurements of an average-

¹ *Section 24221. GAO Report on Crash Dummies*. H.R.3684 - 117th Congress (2021-2022): Infrastructure Investment and Jobs Act. (2021, November 15). <https://www.congress.gov/bill/117th-congress/house-bill/3684>

² *USDOT releases new data showing that road fatalities spiked in first half of 2021*. U.S. Department of Transportation. (2021, October 28). Site: <https://www.transportation.gov/briefing-room/usdot-releases-new-data-showing-road-fatalities-spiked-first-half-2021>

³ *Persons Killed, by Person Type - State: USA, Year: 2019*. National Highway Traffic Safety Administration (2020). Site: <https://www-fars.nhtsa.dot.gov/People/PeopleAllVictims.aspx>

⁴ Samarraï, F. (2019, July 25). *Study: New cars are safer, but women most likely to suffer injury*. UVA Today. Site: <https://news.virginia.edu/content/study-new-cars-are-safer-women-most-likely-suffer-injury>

⁵ Kahane, C. J. (2013, May). *Injury vulnerability and effectiveness of occupant protection technologies for older occupants and women*. Page i. National Highway Traffic Safety Administration. Site: <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/811766>

sized male from the 1970s.⁶ Testing vehicle safety for women using scaled-down male dummies is dangerous, as female drivers are significantly more vulnerable to certain injuries in crashes, such as those to the neck and abdomen.⁷ Relative to males of the same age, females in deadly crashes were found to be 39 percent more likely to die from neck injuries and 32 percent more likely to die from abdominal injuries.⁷ The risks of vehicle safety features designed with only male drivers in mind are exacerbated when women become pregnant because standard seatbelts do not fit pregnant women.⁸ Ultimately, omitting crash test dummies that reflect women inhibits complete information gathering and produces inaccurate vehicle safety performance evaluations.

To better protect all drivers and ensure vehicles' safety features take women drivers and passengers into account, we urge the Department to do the following:

1. Transition to the latest generation of crash test dummy technology for both male and female occupants.
2. Require all tests, such as those in the NCAP and FMVSS, use the most up-to-date male and female crash test dummy technology in driver and passenger seat tests.

These policies would advance gender equity in auto safety regulations and save lives.

Thank you for your attention to this matter. We look forward to collaborating with you on this request.

Sincerely,



Brenda L. Lawrence
Member of Congress



Kathy Castor
Member of Congress



Rosa L. DeLauro
Member of Congress



Eleanor Holmes Norton
Member of Congress



Jan Schakowsky
Member of Congress

⁶ Gupta, A. H. (2021, December 27). *Crash test dummies made cars safer (for average-size men)*. The New York Times. Retrieved January 12, 2022, from <https://www.nytimes.com/2021/12/27/business/car-safety-women.html>

⁷ Kahane, C. J. (2013, May). *Injury vulnerability and effectiveness of occupant protection technologies for older occupants and women*. Page 84. National Highway Traffic Safety Administration. Site: <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/811766>

⁸ *Inclusive crash test dummies: Rethinking standards and reference models*. Stanford University - Gendered Innovations. (2021). Site: <http://genderedinnovations.stanford.edu/case-studies/crash.html#tabs-2>

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Lois Frankel
Member of Congress

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Jackie Speier
Member of Congress

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Cheri Bustos
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Nydia M. Velazquez
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