



**Statement of the National Safety Council
to
House Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade
on
“Looking Under The Hood: The State of NHTSA and Motor Vehicle Safety” Hearing
June 26, 2025**

The National Safety Council (NSC) appreciates the opportunity to submit this statement for the record in advance of today’s hearing titled: “Looking Under The Hood: The State of NHTSA and Motor Vehicle Safety.” This hearing is especially opportune as Congress begins the process of reauthorizing the National Highway Traffic Safety Administration (NHTSA) through the surface transportation reauthorization process. It is the belief of NSC that a strong NHTSA is imperative to ensuring more lives are not lost on our roadways. Through its mission to initiate light vehicle safety rulemakings, issue recalls and inspect defects, NHTSA helps the average American consumer have peace of mind when they enter their vehicle.

National Safety Council

The National Safety Council (NSC) is America’s leading nonprofit safety advocate – and has been for over 110 years. As a mission-based organization, we work to eliminate the leading causes of preventable death and injury, focusing our efforts on the workplace and roadway. We create a culture of safety to protect people from hazard and injury in the workplace and beyond so they can live their fullest lives. Our more than 13,000 member companies and federal agency partners represent employees at nearly 41,000 U.S. worksites.

The State of the Roadway Safety Crisis

Our current road safety metrics are deeply troubling. According to Injury Facts, 44,762 people died in fatal motor vehicle crashes in 2023.¹ Medically consulted injuries in motor vehicle crashes totaled 5.1 million in 2023, and total motor vehicle injuries cost the United States economy an estimated \$513.8 billion that year.² Risky driving behaviors such as speeding, alcohol-impaired driving, drugged and distracted driving continue to be the leading causal factors behind crashes. 2023 fatality estimates for vulnerable road users (VRUs) suggest a slight decline, but these estimates are still above 2019 levels.³ It's high time that we do better in the United States to keep people safe on our roadways.

¹ <https://injuryfacts.nsc.org/motor-vehicle/overview/introduction/>

² Ibid.

³ <https://www.ghsa.org/sites/default/files/2024-06/2023%20Pedestrian%20Traffic%20Fatalities%20by%20State.pdf>

The United States desperately needs a long-term vision, which should be required by statute, that engages United States Department of Transportation leadership with transportation stakeholders that are committing to reaching zero fatalities and serious injuries by 2050. This vision or action plan should allow technology providers, motor vehicle manufacturers and safety advocates the ability to think collaboratively about safety measures that will make long term impacts and save lives.

Vehicle Technology as a Solution to the Roadway Safety Crisis

To enable change in our roadway safety culture, a major shift is needed at our regulatory agencies. Agencies, such as NHTSA, have become risk averse – thus keeping our technological innovation at a standstill. The in-vehicle technology to eliminate alcohol-impaired driving exists. The in-vehicle technology to prevent pediatric vehicular heatstroke exists.⁴ The in-vehicle technology to prevent motor vehicle crashes exists. Congress must work together with NHTSA to ensure motor vehicles are the safest they can be on our roads, while supporting behavioral programs to ensure drivers make good decisions behind the wheel.

The Infrastructure Investment and Jobs Act (IIJA) was a landmark piece of legislation which included numerous rulemakings for NHTSA to complete by statutory deadlines. These rulemakings would utilize technology to advance safety and mitigate crash risk from motor vehicles. Sadly, many of these rulemakings have not been started or seen to completion. In a 2024 letter to then NHTSA Deputy Administrator Sophie Shulman, Senator Edward Markey and eight other Senate colleagues addressed the backlog of vital rulemakings where NHTSA had fallen short of completion.⁵

While addressing its backlog of regulatory requirements, NHTSA must also be forward looking in advancing vehicle safety for the American people. These forward-looking safety technology measures should directly address the crash risks that we see today. An example where states are already moving in the right direction is Intelligent Speed Assistance (ISA) technology to curb speeding deaths.

Speeding killed 11,775 people in the United States in 2023.⁶ ISA is a technology that alerts a driver to when they have engaged a vehicle above the designated speed threshold set by a municipal, local, or state government. This technology can either be passive, solely alert the driver through haptic or audiovisual alerting, or active through automatically preventing speeding above a designated speed limit. NHTSA recommends this technology through a three-star effectiveness rating in its *Countermeasures That Work* for speeding and speed management.⁷

⁴ <https://www.kidsandcars.org/news/post/examples-of-available-technology-to-prevent-hot-car-deaths>

⁵ https://www.markey.senate.gov/imo/media/doc/nhtsa_traffic_safety_letter2.pdf

⁶ <https://www.nhtsa.gov/risky-driving/speeding>

⁷ <https://www.nhtsa.gov/book/countermeasures-that-work/speeding-and-speed-management/countermeasures/other-strategies-1>

The District of Columbia, Virginia and Georgia have all passed legislation which would require ISA technology in the vehicles of habitual reckless drivers.⁸ Furthermore, bills have been introduced in New York, Arizona, Maryland and California to also require this technology.⁹ Congress should build off of this momentum and require NHTSA to complete a rulemaking which requires ISA technology on all newly manufactured vehicles sold in the United States. This requirement would be in line with the European New Car Assessment Program (Euro NCAP) promotion of “installation of speed assistance systems that support drivers to control their speed” and the 2022 NHTSA Request for Comment (RFC) on inclusion of ISA in NCAP which the National Transportation Safety Board (NTSB) recommends.^{10,11}

ISA technology, in conjunction with passive impaired driving prevention and detect to prevent technologies, would ensure speeding, impaired driving and pediatric vehicular heatstroke (PVH) become a risky driving behavior of the past – making both our roads and our vehicles safer. Congress must require NHTSA to advance these measures.

Autonomous Vehicles on American Roads

Every day there are new headlines covering partnerships and deployments of passenger vehicle autonomous vehicles in the United States.¹² While NSC supports the adoption of autonomous passenger vehicles (AV) to offer additional mobility options for consumers, there are still robust concerns around the current safety measures of these vehicles and potentially new safety risks with the adoption of waivers for novel designs. Congress should support this burgeoning industry, but NHTSA cannot cede its role as an active regulator in ensuring vehicles on the road comply with Federal Motor Vehicle Safety Standards (FMVSS). Moreover, vehicles granted waivers should not result in an increase in safety risks for passengers, and vehicles with defects or software issues should be immediately grounded until fixes are in place.

In comments to NHTSA on their proposed Automated Driving System (ADS) Equipped Vehicle, Safety, Transparency and Evaluation Program (AV STEP), NSC proposed numerous focuses for NHTSA to ensure safety is at the forefront of deployments. These focuses include:

1. A strong and mandatory ADS FMVSS that can be complied with and enforced;
2. Required fallback personnel for ADS passenger vehicle operations; and
3. NHTSA should not cede its authority to independent assessors for ADS technology.

⁸ <https://visionzeronetwork.org/accelerating-safety-states-champion-intelligent-speed-assistance/>

⁹ Ibid.

¹⁰ <https://www.euroncap.com/en/car-safety/the-ratings-explained/safety-assist/speed-assistance/>

¹¹ https://www.nhtsa.gov/sites/nhtsa.gov/files/2024-04/NHTSA-NTSB-Response_April-2024_Intelligent-Speed-Assistance_ISA-Interlock_Speeding_NCAP.pdf

¹² <https://www.cnbc.com/2025/06/24/uber-waymo-robotaxi-service-opens-to-passengers-in-atlanta.html>

Recently, U.S. Transportation Secretary Sean Duffy has highlighted AV deployment as a critical component of his “Innovation Agenda.”¹³ Part of this agenda is the inclusion of exemptions for AVs with novel designs, including the elimination of steering wheels, pedals, and front seating systems.¹⁴ While these exemptions need to be proven to be in the public interest, NSC believes there is no safety reason as to not require these systems today. In the event a vehicle malfunctions, the traveling public must not bear the brunt of technology’s failures and should have the chance to reengage the vehicle through the driving task. This becomes impossible when there are no steering wheels or pedals. As ADS technology matures, novel designs may become commonplace, but today the technology is too immature.

Conclusion

Congress must continue to hold NHTSA accountable for completing required rulemakings which will keep everyday Americans safe inside of their vehicles. NSC looks forward to continuing to partner with the Committee to decrease the death and serious injuries that occur on our roads. By bringing together safety stakeholders, manufacturers and technologists, we will solve the road safety challenges that we face today.

¹³ <https://www.transportation.gov/innovation-agenda>

¹⁴ <https://www.nhtsa.gov/press-releases/streamline-exemption-process-noncompliant>