

Testimony by David Harkey
President, Insurance Institute for Highway Safety
Submitted to the House Committee on Energy and Commerce:
Subcommittee on Commerce, Manufacturing, and Trade
For the hearing “Looking Under the Hood: The State of NHTSA and Motor Vehicle Safety”
June 26, 2025

Thank you for the opportunity to share the perspective of the Insurance Institute for Highway Safety (IIHS) on the state of motor vehicle safety and the role of the National Highway Traffic Safety Administration (NHTSA).

IIHS is an independent, nonprofit scientific and educational organization dedicated to reducing deaths, injuries and property damage from motor vehicle crashes through research and evaluation and through education of consumers, policymakers, and safety professionals. Our work is wholly supported by U.S. and Canadian auto insurers.

Today’s hearing is timely because the United States is in the middle of a road safety emergency. Crash deaths have risen nearly 30% since 2014, from below 33,000 to more than 42,000 in 2022. This spike in fatalities, which follows decades of progress, is not a global trend; in fact, the U.S. is an outlier. Today among 29 high-income countries, we rank at the bottom based on per capita fatality rate, and our rate is more than double the average.¹ While fatalities inched down 4% in 2023, it’s too early to say whether this is the beginning of lasting progress.

At IIHS, we are alarmed by the rising toll of crashes on our nation’s roads and dismayed by an apparent lack of urgency about fixing the problem. For this reason, we recently launched an initiative we are calling 30x30—a goal to reduce U.S. fatalities 30% by 2030.² We hope all stakeholders will rally around this vision and pledge specific actions to contribute to the effort. For our part, IIHS has laid out a series of concrete research, testing, and education actions in the areas of risky behaviors, commercial vehicles, and safety for everyone inside and outside of vehicles. But we absolutely cannot do this alone. To make

30x30 a success and change our current road safety trajectory, we will need all hands on deck. NHTSA, in particular, will need to help.

NHTSA's predecessor agencies were founded in the 1960s. Over the next several decades, NHTSA played a key role in moving safety forward, most directly by issuing safety standards. For example, the requirement that all vehicles be equipped with frontal airbags is estimated to have saved 70,000 lives through 2019.³ A more recent regulation mandating electronic stability control has saved nearly 30,000 lives.

But NHTSA's safety leadership goes well beyond regulation. The agency is the only large source of funding in the country for behavioral research, helping us understand key topics such as impaired driving, distraction, and speeding.

NHTSA also assists state and local governments with their critical road safety work by providing research and guidance on safety problems and countermeasures. Most critically, it funds demonstration projects that are crucial for showing other states and communities what safety interventions work and helping them decide where to focus their efforts with their limited resources.

One of the most influential demonstrations that NHTSA backed was a program called Click It or Ticket, a high-visibility seat belt enforcement program that began as a public-private partnership involving IIHS, NHTSA, and other stakeholders in North Carolina in the 1990s.⁴ Funds from NHTSA allowed the program to expand to new states beginning in 2000, bringing the program nationwide by 2003. This campaign was a key component of a remarkable cultural shift: From 1999 to 2009, front seat belt use increased from 67% to 84%.⁵ Nationwide expansion of Click It or Ticket would not have been feasible without NHTSA's support.

NHTSA's data collection also enables much of the research that IIHS and other organizations conduct. This includes the Fatality Analysis Reporting System and other crash databases, as well as surveys such as the National Roadside Survey on impaired driving and the National Occupant Protection Use Survey, which measures seat belt and motorcycle helmet use as well as electronic device use by drivers.

Finally, the 5-Star Safety Ratings produced by NHTSA's New Car Assessment Program have been an important source of information for consumers shopping for the safest vehicles.

Despite its many important roles and significant past achievements, NHTSA is failing to meet the moment. In recent years, it has approached its job with a lack of urgency, using flawed methodologies that underestimate the safety benefits of obviously beneficial interventions.

One example of an action that we have repeatedly called on NHTSA to take is to require antilock braking systems (ABS) for motorcycles. Multiple IIHS studies have shown that this technology saves lives. Our most recent analysis, published in 2022, found that fatal crash rates for motorcycles with optional ABS are 22 percent lower than for identical models without the technology.⁶

We first petitioned NHTSA to require motorcycle ABS in 2013. Ten years later, we submitted a new petition with updated evidence. To date, we have not received any response to either petition. In the meantime, the 27 member states of the European Union, the United Kingdom, Brazil, Japan, Taiwan, Australia, New Zealand and India have all mandated the life-saving technology.

NHTSA sometimes drags its feet even when Congress has directed it to act. A case in point is the 2021 Bipartisan Infrastructure Law's instructions to NHTSA to issue a rule requiring impaired driving prevention technology on new vehicles. The law stipulated a deadline of 2024 for a final rule, but so far NHTSA has only issued an advance notice of proposed rulemaking.

Unlike motorcycle ABS, advanced alcohol detection technology is still in development, but it is closer to reality than many people realize. A mandate from NHTSA would likely provide just the push it needs, potentially spelling the end of a persistent road safety problem and saving nearly 11,000 lives a year.⁷

In many cases, IIHS has found ways to fill gaps left by NHTSA. While we lack regulatory authority, we have substantial influence with consumers and vehicle manufacturers. Our IIHS *TOP SAFETY PICK* awards complement the 5-star ratings, pushing automakers to improve vehicle structures, airbags, seat belts and other safety equipment. In some cases, regulations have caught up, while in other cases, such as headlight performance, it is our ratings alone that are driving improvements.

We have also welcomed opportunities to work cooperatively with NHTSA. In 2015, IIHS and NHTSA joined forces to challenge the auto industry to make automatic emergency braking standard on all vehicles. The resulting voluntary commitment by 20 automakers helped bring this technology into the mainstream more quickly than was possible under the regulatory process.⁸

As a privately funded nonprofit, we have the freedom and flexibility to look for creative solutions. For example, when NHTSA was moving too slowly on updating the standard for rear underride guards for tractor-trailers, we began conducting our own underride tests and inaugurated the IIHS **TOUGHGUARD** award for trailer manufacturers.⁹ In 2015, just 1% of trailers sold in the U.S. met the **TOUGHGUARD** criteria. Today, more than two-thirds do.

As with other issues, we cannot completely make up for NHTSA's lack of substantive action on underride. The agency finally updated its rear underride rule in 2022, but it remains much less stringent than the **TOUGHGUARD** criteria. The rule also exempts many types of trucks. Until NHTSA fixes these problems, trucks with weak guards will remain on the road, posing a danger to people in smaller vehicles. This is just one of many areas where action by NHTSA could make an important difference.

Another is automation. As automakers introduce more and more automation in vehicles, the current regulatory gap leaves many drivers in the dark about what their vehicles can and cannot do. We have all seen the crashes that have resulted from drivers over-relying on partial automation systems that fall well short of self-driving. IIHS has developed partial automation safeguard ratings to help ensure drivers stay engaged while using these systems.¹⁰ Still, we need active oversight from NHTSA to help guide innovation and ensure it does not introduce new driving risks.

In closing, NHTSA has an essential role to play in confronting our current road safety emergency, but doing so requires stronger leadership, a sense of urgency, and a greater willingness to act.

References

1. Yellman, M. A., & Sauber-Schatz, E. K. (2022, July 1). Motor vehicle crash deaths—United States and 28 other high-income countries, 2015 and 2019. *Morbidity and Mortality Weekly Report*, 71(26), 837–843. <http://doi.org/10.15585/mmwr.mm7126a1>
2. Harkey, D. (2025, February 20). *As Vision Zero hopes fade, a 5-year goal can help us reset*. Insurance Institute for Highway Safety. <https://www.iihs.org/news/detail/as-vision-zero-hopes-fade-a-5-year-goal-can-help-us-reset>
3. Kahane, C. J., & Simons, J. F. (2024, December). *Fatalities, injuries, and crashes prevented by vehicle safety technologies and associated FMVSS, 1968 to 2019—Passenger cars and LTVs* (Report No. DOT HS 813 611). National Highway Traffic Safety Administration.
4. Tison, J., & Williams, A. F. (2010). *Analyzing the first years of the Click It or Ticket mobilizations*. National Highway Traffic Safety Administration. <https://doi.org/10.21949/1525686>
5. National Center for Statistics and Analysis. (2009, September). *Seat belt use in 2009—Overall results* (Traffic Safety Facts Research Note No. DOT HS 811 200). National Highway Traffic Safety Administration. <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/811200>
6. Teoh, E. R. (2022). Motorcycle antilock braking systems and fatal crash rates: updated results. *Traffic Injury Prevention*, 23(4), 203–207. <https://doi.org/10.1080/15389588.2022.2047957>
7. Farmer, C. M. (2023, April). *Update of the 2021 study "Potential lives saved by in-vehicle alcohol detection systems" published in Traffic Injury Prevention*, 22(1), 7–12 [Unpublished analyses]. Insurance Institute for Highway Safety.
8. Insurance Institute for Highway Safety. (2023, December 21). *Automakers fulfill autobrake pledge for light-duty vehicles*. <https://www.iihs.org/news/detail/automakers-fulfill-autobrake-pledge-for-light-duty-vehicles>

9. Insurance Institute for Highway Safety. (2018, September 27). *All major trailer makers earn IIHS award for good underride protection*. <https://www.iihs.org/news/detail/all-major-trailer-makers-earn-iihs-award-for-good-underride-protection>
10. Insurance Institute for Highway Safety. (2024, March 12). *First partial driving automation safeguard ratings show industry has work to do*. <https://www.iihs.org/news/detail/first-partial-driving-automation-safeguard-ratings-show-industry-has-work-to-do>

Key points

The United States is in the middle of a road safety emergency. Crash deaths have risen nearly 30% since 2014, from below 33,000 to more than 42,000 in 2022. Among 29 high-income countries, we rank at the bottom based on per capita fatality rate, and our rate is more than double the average.

IIHS has launched the 30x30 initiative—a goal to reduce U.S. fatalities 30% by 2030. We invite all stakeholders to contribute to this effort and hope NHTSA will take a leading role.

Historically, NHTSA has played a key role in safety progress by issuing regulations, funding behavioral research, providing guidance to state and local governments, funding demonstration projects, and collecting data used in a wide range of research by IIHS and others. The 5-Star Safety Ratings produced by NHTSA's New Car Assessment Program have been an important source of information for consumers shopping for the safest vehicles.

Unfortunately, NHTSA is failing to meet the moment. In recent years, it has approached its job with a lack of urgency, failing to take action on a variety of important issues. For example, IIHS has twice petitioned NHTSA to require lifesaving antilock braking systems for motorcycles. We have received no response. In another example, NHTSA has missed a congressional deadline to issue a final rule requiring impaired driving prevention technology on new vehicles. Such technology could save nearly 11,000 lives a year.

IIHS lacks regulatory authority, but we have found ways to fill some of the gaps left by NHTSA through our *TOP SAFETY PICK* awards and other efforts. Nevertheless, in issues ranging from truck underride to vehicle automation, NHTSA's lack of action has left a void.

NHTSA has an essential role to play in confronting our current road safety emergency, but doing so requires stronger leadership, a sense of urgency, and a greater willingness to act.