

October 16, 2025

The Honorable Sean Duffy
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Dear Secretary Duffy:

As you are undoubtedly aware, the National Transportation Safety Board (NTSB) recently issued an investigation report of a multi-vehicle crash that occurred in Ohio in 2023 involving a heavy combination vehicle that crashed into stopped traffic killing six individuals and injuring more than forty.¹ The NTSB reiterated its safety recommendation to the National Highway Traffic Safety Administration (NHTSA) to require automatic emergency braking (AEB) in commercial motor vehicles (CMVs).² In fact, the NTSB first issued such a recommendation in 2015, and it has been repeated six times and is currently classified as “Open—Unacceptable Response.”³ We write to urge the U.S. Department of Transportation (DOT) to take action to prevent future catastrophic crashes by advancing and issuing a Final Rule requiring AEB systems for all new CMVs.

Truck crashes are disturbingly high. In 2023, 5,472 people were killed and over 153,000 people were injured in crashes involving large trucks.⁴ Since 2009, the number of fatalities in large truck crashes has increased by 62 percent.⁵ In that same timespan, the number of people injured in crashes involving large trucks rose by 107 percent.⁶ In fatal two-vehicle crashes between a large truck and a passenger motor vehicle, 97 percent of the fatalities were occupants of the passenger vehicle.⁷

Truck driving, which is an essential occupation in our Nation’s economy, is identified as one of the most dangerous jobs in the U.S. by the Bureau of Labor Statistics.⁸ In 2023, 961 occupants of large trucks were killed in crashes.⁹ We need to protect, not endanger, hard-working truck drivers.

According to the Federal Highway Administration (FHWA), traffic incidents, which include crashes, are one of the seven main causes of traffic congestion which erodes the reliability of travel time.¹⁰ The report notes that for truck operators, “[t]he cost of unexpected delay can add another 20 percent to 250 percent” to their hourly costs.¹¹ The cost to society from crashes involving large trucks and buses was estimated to be \$128 billion in 2021, the latest year for which data is available.¹² When adjusted solely for inflation, this figure amounts to over \$155 billion.¹³

Equipping heavy vehicles with AEB systems is one of the most effective and available solutions to reducing these unacceptable crash statistics. According to the Insurance Institute for Highway Safety (IIHS), equipping large trucks with forward collision warning and AEB could eliminate more than two out of five crashes in which a large truck rear-ends another vehicle.¹⁴

Recognizing the safety benefits of requiring AEB on heavy vehicles, the bipartisan Infrastructure Investment and Jobs Act (IIJA) required the U.S. DOT to issue a Final Rule by November 2023.¹⁵ In response, U.S. DOT issued a Notice of Proposed Rulemaking (NPRM) in July 2023 stating “[t]he safety problem addressed by AEB is substantial.”¹⁶ In addition, the U.S. DOT estimates that requiring AEB and electronic stability control (ESC) on heavy vehicles will eliminate nearly 20,000 crashes, save over 150 lives and reduce nearly 9,000 injuries annually.¹⁷

Moreover, it has been a decade since NHTSA granted a petition filed by safety groups seeking to require AEB on heavy vehicles.¹⁸

Far too many people are killed and injuries are sustained each year in crashes involving heavy vehicles. Research has consistently proven that AEB systems can prevent or mitigate many of these senseless tragedies. As such, the undersigned urge U.S. DOT to complete this rulemaking without further delay.

Sincerely,

AAA

Advocates for Highway and Auto Safety

BioInjury LLC

Center for Auto Safety

Citizens for Reliable and Safe Highways

Consumer Federation of America

Consumers for Auto Reliability and Safety

Families for Safe Streets

Governors Highway Safety Association

Kids and Car Safety

National Coalition for Safer Roads

National Consumers League

National Safety Council

Parents Against Tired Truckers

Safety Research & Strategies, Inc.

Society for Advancement of Violence and Injury Research

Trauma Foundation

Truck Safety Coalition

¹ NTSB, Highway Investigation Report HIR-2505, Multivehicle Collision and Postcrash Fire on Interstate 70 (Sep. 3, 2025).

² *Id.* at pg. 71.

³ *Id.* at pg. 60.

⁴ Traffic Safety Facts Research Note: Overview of Motor Vehicle Traffic Crashes In 2023, NHTSA, Apr. 2025, DOT HS 813 705, (Overview 2023).

⁵ Traffic Safety Facts 2023: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, DOT HS 813 738, Aug. 2025. Note, the 62 percent figure represents the overall change in the number of fatalities in large truck involved crashes from 2009 to 2023. However, between 2015 and 2016 and between 2019 and 2020 there were changes in data collection at U.S. DOT that could affect this calculation. From 2009 to 2015 the number of fatalities in truck-involved crashes increased by 21 percent, between 2015 and 2016 it increased by 14percent, between 2016 and 2019 it increased by 8percent, between 2019 and 2020 it decreased by 2percent, and between 2020 and 2023 it increased by 11percent.

⁶ Traffic Safety Facts 2023: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, DOT HS 813 738, Aug. 2025. Note, the 107 percent figure represents the overall change in the number of people injured in large truck involved crashes from 2009 to 2023. However, between 2015 and 2016 and between 2019 and 2020 there were changes in data collection at U.S. DOT that could affect this calculation. From 2009 to 2015 the number of people injured in truck-involved crashes increased by 59 percent, between 2015 and 2016 it increased by 14 percent, between 2016 and 2019 it increased by 18percent, between 2019 and 2020 it decreased by 11percent, and between 2020 and 2023 it increased by 8percent.

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- ⁷ Insurance Institute for Highway Safety (IIHS), Large Trucks. <https://www.iihs.org/topics/fatality-statistics/detail/large-trucks>.
- ⁸ National Census of Fatal Occupational Injuries in 2023, Bureau of Labor Statistics, Dec. 2024, USDL-24-2564, available at: <https://www.bls.gov/news.release/pdf/cfoi.pdf>.
- ⁹ Overview 2023.
- ¹⁰ Traffic Congestion and Reliability: Trends and Advanced Strategies for Congestion Mitigation, March 2020, FHWA. Available here: https://ops.fhwa.dot.gov/congestion_report/chapter2.htm (2020 Traffic Congestion and Reliability Report.)
- ¹¹ 2020 Traffic Congestion and Reliability Report.
- ¹² 2023 Pocket Guide to Large Truck and Bus Statistics, FMCSA, Dec. 2023, RRA-23-003.
- ¹³ CPI Inflation Calculator, BLS, available at https://www.bls.gov/data/inflation_calculator.htm, calculated from Jan. 2021 – Jan. 2025.
- ¹⁴ IIHS, Study shows front crash prevention works for large trucks too, available at: <https://www.iihs.org/news/detail/study-shows-front-crash-prevention-works-for-large-trucks-too>.
- ¹⁵ Pub. L. 117-58, Sec. 23010 (2021).
- ¹⁶ 88 Federal Register 43174, 43178 (July 6, 2023).
- ¹⁷ *Id.* at 43176.
- ¹⁸ 80 FR 62487 (Oct. 16, 2015).