



NATIONAL CONSUMERS LEAGUE

1701 K Street, NW, Suite 1200 Washington, DC 20006

Main: (202) 835-3323 Fax: (202) 835-0747 www.nclnet.org

February 10, 2026

The Honorable Brett Guthrie
Chair
Energy & Commerce Committee
United States House of Representatives
Washington, D.C. 20515

The Honorable Gus M. Bilirakis
Chair
Commerce, Manufacturing, and Trade
Subcommittee
United States House of Representatives
Washington, D.C. 20515

The Honorable Frank Pallone, Jr.
Ranking Member
Energy & Commerce Committee
United States House of Representatives
Washington, D.C. 20515

The Honorable Jan Schakowsky
Ranking Member
Commerce, Manufacturing, and Trade
Subcommittee
United States House of Representatives
Washington, D.C. 20515

Dear Chairs Guthrie and Bilirakis, and Ranking Members Pallone and Schakowsky,

The National Consumers League (NCL) respectfully submits this letter for the markup of several motor vehicle bills by the Subcommittee on Commerce, Manufacturing, and Trade. We applaud you for seeking to reduce the unacceptable loss of life, physical injuries, and economic costs attributable to motor vehicle crashes.

Each year, approximately 40,000 lives are lost and 2.6 million people are injured in traffic crashes. That's enough fatalities to fill the average Major League Baseball stadium—enough injuries to affect nearly every resident of the state of Alabama. Traffic crashes cost society nearly a trillion dollars in medical bills, emergency services, lost productivity, insurance costs, workplace loss, legal expenses, and property damage. That's enough money to purchase more than 26 million mid-size SUVs, ten million more than the total number of cars sold in 2024.

The death and destruction on our nation's roads does not have to be the price we pay for commuting to work, dropping the kids off at school, or picking up groceries. In the remainder of the letter, we provide feedback on bills slated for consideration at the markup.

H.R. 7372—Safety is Not for Sale Act (Ranking Member Pallone)

NCL strongly supports the Safety is Not for Sale Act, as such legislation is vital to ensuring consumers have more affordable access to lifesaving automobile safety features. NCL found that some advanced driving assistance systems (ADAS) are sold as luxury items that must be purchased for an extra fee or as part of expensive add-on packages. These additional costs may put these life-saving technologies out of reach for many Americans. Please see the attached fact sheet for additional information.

H.R. 7389—Motor Vehicle Modernization Act (Chairman Guthrie)

The Motor Vehicle Modernization Act seeks to enact several reforms to improve NHTSA's effectiveness and efficiency.

- Sec. 7. Project Management Practices – This section requires NHTSA to update procedures for rulemakings and reports to require the use of leading project schedule management practices. The Government Accountability Office (GAO) found that NHTSA has not consistently followed leading project schedule management practices in developing mandated rulemakings and reports. These practices, which include establishing milestones and sequencing activities, can help manage project timeframes and reduce delays. GAO recommended that NHTSA update procedures for rulemakings and reports to require the use of leading project schedule management practices. NCL believes that enshrining these GAO recommendations in law is an important tool for oversight and accountability, helping ensure a more responsive and effective NHTSA.
- Sec. 8. General Exemptions – This section expands NHTSA's authority to permit noncompliant vehicles on the nation's roads. Current law permits manufacturers of motor vehicles to deploy non-compliant vehicles for testing or evaluation, provided that those vehicles are not sold. A provision in the Motor Vehicle Modernization Act seeks to expand that authority to apply to suppliers. Further, the SELF DRIVE Act seeks to create a federal framework for the introduction of noncompliant autonomous vehicles (AVs). It is unclear why manufacturers would need to deploy noncompliant vehicles at the levels contemplated in Sec. 8. Such a high number of noncompliant vehicles on the nation's roads presents safety risks.
- Sec. 9. Testing and Evaluation of Motor Vehicle Equipment – This section permits suppliers manufacturing motor vehicle equipment prior to 2016 to deploy noncompliant motor vehicle equipment for the purposes of testing or demonstration, provided such motor vehicle or motor vehicle equipment is not sold at the conclusion of testing. Suppliers should have the authority to test innovative safety devices with reasonable commercial limitations. NCL supports this provision.

H.R. 7390—SELF DRIVE Act (Rep. Latta)

The SELF DRIVE Act seeks to “ensure continued United States leadership in the global automotive and autonomous driving sector, improve road safety, mobility, and accessibility, and create American jobs” by supporting the deployment of AVs, which are vehicles capable of performing the entire driving task without human intervention. We applaud Representative Latta (R-OH) for embarking on this legislative effort to support the safe and responsible deployment of AVs. NCL believes that it is important for the United States to establish such a framework for AV deployment.

In its current form, the legislation presents concerns related to safety, accessibility, justice, and economic opportunity. We are optimistic that these concerns can be resolved and

stand ready to work closely with the author of the legislation and committee staff to refine the text.

H.R. 5221—PART Act (Reps. Baird and McCollum)

The PART Act requires NHTSA to mandate that catalytic converters be affixed with antitheft markings, establishes a grant program to facilitate the marking of catalytic converters currently deployed in interstate commerce, and increases criminal penalties for catalytic converter theft. We are encouraged that the Committee is taking action to prevent catalytic converter theft, which has become a major consumer and environmental protection issue.

H.R. 7377—Know Before You Drive Act (Rep. Schrier)

The Know Before You Drive Act prohibits manufacturers from making misleading representations about the capabilities and limitations of AVs and partially automated vehicles. This legislation establishes vital protections preventing consumer confusion and misuse of partial driving automation.

We thank you for considering our perspective on improving roadway safety, automobile innovation, and American competitiveness, and stand ready to work with you on these various legislative proposals.

Sincerely,



Daniel Greene
Senior Director of Consumer Protection & Product Safety
The National Consumers League

Safety Is Not for Sale

Improving the Accessibility and
Affordability of Vital Safety Features

Technology That Reduces Crashes and Injuries

Forward Collision Warning Auto Emergency Brake  56% fewer front-to-rear injuries	Lane Departure Warning  21% fewer injury crashes	Blind-Spot Detection  23% fewer lane-change injury crashes	Driver Attention System  12,405 deaths from distraction in 2021
Drowsy Driving Alerts  664 deaths from drowsy driving	High-Performance Headlights  19% fewer nighttime single-vehicle crashes	Pedestrian Visibility  23% fewer nighttime pedestrian crashes	Post-Crash SOS Alert  1.6–3.3% fewer fatalities yearly

Life-saving safety and driver assistance technologies are often only available on luxury models or sold as part of expensive add-on packages that include non-safety-related features, such as lavish moonroofs, leather upholstery, and heated seats. Bundling safety systems with non-essential luxury items makes vital safety technologies less accessible and affordable. Congress should pass a law making it unlawful for sellers of optional safety systems to bundle those systems with non-safety-related equipment.

Advanced Driver Assistance Systems

Several novel, sophisticated technologies promise to dramatically improve roadway safety:

- Advanced Driver Assistance Systems (ADAS) – ADAS are suites of sensors and software that alert drivers to potential dangers and, in some cases, automatically steer or brake to mitigate or avoid collisions. Forward collision warning and automatic emergency brakes have been shown to reduce injuries associated with front-to-rear crashes by 56 percent. Lane departure warnings could reduce single-vehicle, sideswipe, and head-on crashes causing injury by 21 percent. Blind-spot detection has been shown to reduce lane-change crashes that result in injuries by 23 percent.
- Driver Monitoring – Driver monitoring systems use sensors and cameras to detect a driver's attentiveness and issue alerts prompting the driver to re-engage. Distracted driving [claimed](#) an estimated 12,405 lives in 2021. Drowsy driving [caused](#) 664 deaths that same year.
- Advanced Headlamps – Approximately half of traffic deaths occur in dark or twilight conditions. Innovative headlamp technologies can reduce glare and increase illumination of the roadway. Vehicles with [good ratings](#) for visibility in the IIHS headlight test have 19% fewer nighttime single-vehicle crashes and 23% fewer nighttime pedestrian crashes than vehicles with poor-rated headlights.
- Automatic Collision Notification – Automatic Collision Notification is a post-crash safety feature that automatically calls emergency services in the event of a crash. NHTSA [estimates](#) that such systems can reduce fatalities by 1.6 to 3.3 percent annually.
- Enhancing Vision – Some vehicles are equipped with cameras, enhancing visibility around the vehicle when parking or operating at low speeds. Such systems can prevent frontover crashes, in which pedestrians (typically children) obscured by the blind zone immediately in front of a vehicle are struck.

Bundles

A 2020 Consumer Reports [analysis](#) found that safety systems are often only available on luxury versions of a vehicle model or bundled into packages with non-safety-related equipment, making these life-saving technologies less accessible and affordable for many Americans. Several manufacturers continue to engage in this practice, with bundles ranging from a few hundred to thousands of dollars (see Table 1).

Recommendations

Congress should pass legislation establishing:

- Brightline requirement – A person offering an optional safety system for sale to a first purchaser must disclose and provide such system for purchase separately from non-safety-related equipment.
- Availability – Ensure that lifesaving features for a vehicle model are available for all vehicles within that model.
- Enforcement – Grant the Federal Trade Commission (FTC) and state attorneys general the authority to enforce a violation of the Act. After at least one Notice of Penalty Offenses, the FTC can seek civil penalties up to \$50,120 per violation.

Model	Active™, ST-Line™, and ST-Line™ Select		ST-Line™ Select	ST-Line™ Elite and Platinum®		
	Bundle	Base Trim	Tech Pack #1	Tech Pack #2	Base Trim	Premium Technology Build
	Net Price Difference	—	\$995	\$3,700	\$2,115 - \$5,795	\$1,910
Ford Escape® (MY 2025)	Safety Features	—	Adaptive Cruise Control™	Adaptive Cruise Control™	Standard	—
		—	Evasive Steering Assist™	Evasive Steering Assist™	Standard	—
		—	Rear parking sensor	Rear parking sensor	Standard	—
		—	Intersection Assist™	Intersection Assist™	Standard	—
		—	Digital rear-view camera	Digital rear-view camera	Standard	—
		—	360-Degree Camera with Split View™	—	360-Degree Camera with Split View™	—
		—	Reverse Brake Assist™	—	Reverse Brake Assist™	—
		—	—	—	Head-Up Display™	—
		—	—	—	Front parking sensors	—
		—	Connected navigation	Connected navigation	Standard	—
Ford Escape® (MY 2025)	Non-Safety-Related Features	—	SYNC® 4 with enhanced voice recognition	SYNC® 4 with enhanced voice recognition	Standard	—
		—	13.2" LCD capacitive touchscreen with swipe capability	13.2" LCD capacitive touchscreen with swipe capability	Standard	—
		—	—	10-way power driver seat	—	10-way power driver seat
		—	—	6-way power passenger seat	—	6-way power passenger seat
		—	—	B&O® Sound System by Bang & Olufsen®, 10-speakers including subwoofer	—	B&O® Sound System by Bang & Olufsen®, 10-Speakers including Subwoofer
		—	—	HD Radio™	—	HD Radio™
		—	—	Instrument Panel Cluster – 12.3" Digital Productivity Screen	—	Instrument Panel Cluster – 12.3" Digital Productivity Screen
		—	—	Memory package: driver's seat and driver/front passenger sideview mirrors	—	Memory package: driver's seat and driver/front passenger sideview mirrors
		—	—	Wireless charging pad	—	Wireless charging pad
		—	—	—	—	ActiveX® trimmed seats with quilting design and mini-perforation

Model	LX		EX	EX-L
	Net Price Difference	\$—	\$2,230	\$4,480
Honda CR-V® (MY 2025)	Safety Features	—	Blind Spot Information System®	Blind Spot Information System®
		—	Cross Traffic Monitor™	Cross Traffic Monitor™
		—	—	Parking sensor (front/rear)
		—	—	Low-Speed Braking Control
	Non-Safety-Related Features	17" in steel with covers	18" silver-painted alloy wheels	18" silver-painted alloy wheels
		—	One-touch power moonroof with tilt feature	One-touch power moonroof with tilt feature
		Power windows with auto up/down driver windows	Power windows with auto up/down driver and passenger windows	Power windows with auto up/down all windows
		Automatic Climate Control System	Dual zone automatic climate control system	Dual zone automatic climate control system
		—	Illuminated drivers' and front passenger's vanity mirrors	Illuminated drivers' and front passenger's vanity mirrors
		Heated front seats	Heated front seats	Heated front seats
Toyota Corolla® (MY 2025)	Safety Features	—	Driver's seat with 10-way power adjustment, including 2-way power lumbar support	Driver's seat with 10-way power adjustment, including 2-way power lumbar support, with two-position memory
		160-watt audio system with 4 speakers	240-watt audio system with 6 speakers	320-watt audio system with 8 speakers
		7.0-in TFT meter display	7.0-in TFT meter display	10.2 in. digital instrument cluster
		—	—	Leather-wrapped steering wheel and shift knob
		—	—	Leather-trimmed seats
		—	USB charging ports – rear seats	USB charging ports – rear seats
		—	—	—
		—	—	—
	Non-Safety-Related Features	8-in. Toyota Audio Multimedia™ touchscreen with six speakers	8-in. Toyota Audio Multimedia™ touchscreen with six speakers	10.5-in. Toyota Audio Multimedia™ touchscreen with six speakers
		Normal and Eco driving modes	Normal, Sport, and Eco driving modes	Standard
		16-in. steel wheels with covers	18-in. alloy wheels with graphite-colored finish	Standard
		—	Single exhaust with dual chrome tips	Standard
		—	Gray metallic sport side rocker panels and color-keyed rear spoiler	Gray metallic sport side rocker panels and rear spoiler
		—	—	Heated driver and front passenger seats
		Tilt/telescopic 3-spoke steering wheel with audio	Leather-trimmed tilt/telescopic 3-spoke steering wheel with audio	Leather-trimmed tilt/telescopic 3-spoke steering wheel with paddle shifters and audio
		Multi-Information Display	Standard	Standard
		Hands-free phone	Standard	Standard
		Voice-command	Standard	Standard

Model	LT		SE	XSE
	Net Price Difference	—	\$2,440	\$3,275
Toyota Corolla® (MY 2025)	Safety Features	Blind Spot Monitor with Rear Cross-Traffic Alert	Standard	Standard
		Pre-Collision System with Pedestrian Detection	Standard	Standard
		Lane Tracing Assist™	Standard	Standard
		Full-Speed Range Dynamic Radar Cruise Control™	Standard	Standard
		Lane Departure Alert with Steering Assist	Standard	Standard
		Automatic High Beams	Standard	Standard
		Road Sign Assist™	Standard	Standard
		—	—	—
	Non-Safety-Related Features	8-in. Toyota Audio Multimedia™ touchscreen with six speakers	8-in. Toyota Audio Multimedia™ touchscreen with six speakers	10.5-in. Toyota Audio Multimedia™ touchscreen with six speakers
		Normal and Eco driving modes	Normal, Sport, and Eco driving modes	Standard
		16-in. steel wheels with covers	18-in. alloy wheels with graphite-colored finish	Standard
		—	Single exhaust with dual chrome tips	Standard
		—	Gray metallic sport side rocker panels and color-keyed rear spoiler	Gray metallic sport side rocker panels and rear spoiler
		—	—	Heated driver and front passenger seats
		Tilt/telescopic 3-spoke steering wheel with audio	Leather-trimmed tilt/telescopic 3-spoke steering wheel with audio	Leather-trimmed tilt/telescopic 3-spoke steering wheel with paddle shifters and audio
		Multi-Information Display	Standard	Standard
		Hands-free phone	Standard	Standard
		Voice-command	Standard	Standard

2026 GMC Sierra 1500	Model	Pro RWD	SLE RWD	Elevation RWD
	Net Price Difference	—	\$7,100	\$8,900
	Safety Features	—	Trailer side blind zone alert	Standard
		Forward collision alert	Standard	Standard
		Front and rear park assist	Standard	Standard
		Rear cross traffic braking	Standard	Standard
		StabiliTrak®, electronic stability control system with traction control	Standard	Standard
		—	Rear pedestrian alert	Standard
		Lane keep assist	Standard	Standard
	Non-Safety-Related Features	—	—	Wireless charging
		—	Rear under-seat storage	Standard
		—	—	Bose® premium sound system
		—	13.4" diagonal multicolor reconfigurable Infotainment	Standard
		—	Heated steering wheel	Standard
		—	Heated driver and front outboard passenger seats	Standard
		3 Years SiriusXM®	Standard	Standard
		—	HD Surround Vision™	Standard
		Inside rearview auto-dimming mirror	Standard	Standard
		All-weather floor liners	Standard	Standard

2025 Jeep® Grand Cherokee®	Model	Laredo A	Limited	Summit Reserve
	Net Price Difference	—	\$6,310	\$25,945
	Safety Features	Active™ lane-management system	Standard	Standard
		Blind-spot and cross-path detection	Standard	Standard
		Full-speed forward-collision warning plus	Standard	Standard
		ParkSense® rear park-assist with stop	Standard	Standard
		—	—	Side distance warning
		—	—	Intersection collision-assist system
		—	—	Drowsy driver detection
	Non-Safety-Related Features	Premium cloth seats	Capri leatherette-trim interior with heated front- and second-row seats and a heated steering wheel	Palermo leather seats with heated front and second-row seats and a heated steering wheel
		Uconnect® 5 with an 8.4-inch touchscreen	Uconnect® 5 with an 8.4-inch touchscreen	Uconnect® 5 Nav with 10.1-inch touchscreen
		—	Six-speaker premium audio system with active noise cancellation	19-speaker high-performance audio
		—	Illuminated cupholders	Standard
		—	Deep-tint privacy glass	Standard
		—	—	Dual-pane panoramic sunroof
		8-way power driver seat	8-way power driver and front passenger seats	16-way adjustable power front seats with memory and massage
		17-inch x 6.5-inch fully painted alum wheels	18-inch x 8-inch polished / painted alum wheels	21-inch x 9-inch machined face/painted alum wheels
		—	—	Ventilated front and rear seats
		4G LTE Wi-Fi® hot spot	Standard	Standard

Ram® Trucks Ram 1500®	Model	2026 Ram 1500® Tradesman® Quad Cab®	2026 Ram 1500® Rebel® Crew	2026 Ram 1500® RHO Crew Cab
	Net Price Difference	—	\$23,715	\$31,765
	Safety Features	—	—	Intersection collision-assist system
		—	—	Traffic sign recognition
		—	—	Surround-view camera system
		—	—	Drowsy driver detection
		—	—	Selec-Speed™ control
		—	—	Selec-Speed™ control
		—	—	Evasive Steering Assist™
	Non-Safety-Related Features	—	—	Head-Up display
		—	Driver-seat memory	Driver-seat memory
		—	Heated second-row seats	Heated second-row seats
		—	—	Massaging driver and front passenger seat
		—	Ventilated front seats	Ventilated front and rear seats
		—	—	Uconnect® 5 Nav with 14.4-inch touch screen display
		—	—	Front passenger interactive display
		—	19-speaker Harman Kardon® premium sound	19-speaker Harman Kardon® premium sound
		—	Dual wireless charging pad	Dual wireless charging pad
		—	Power adjustable pedals with memory	Power adjustable pedals with memory

Tesla® Model Y® (accessed 12/19/25)	Model	Standard (Rear-Wheel)	Premium (All-Wheel)	Performance (All-Wheel)
	Net Price Difference	—	\$9,000	\$17,500
	Safety Features	Traffic-aware cruise control	Standard	Standard
		—	Autosteer™	Standard
		Auto emergency braking	Standard	Standard
		Forward collision warning	Standard	Standard
		Blind-spot collision warning	Standard	Standard
		Lane departure avoidance	Standard	Standard
		—	—	—
	Non-Safety-Related Features	—	FM radio	Standard
		—	8" second-row touchscreen	Standard
		—	Customizable ambient lighting	Standard
		Manual-adjust steering wheel	Power-adjust steering wheel	Standard
		Second-row manual air vents	Second-row touchscreen air vents	Standard
		First-row heated seats	First-row heated and ventilated seats	First-row heated and ventilated sport seats with power tilt and thigh extension
		Passive shock absorbers	Frequency dependent shock absorbers	Electronic continuously variable shock absorbers
		—	—	Drive modes
		15.4" first-row touchscreen	15.4" first-row touchscreen	16" first-row QHD touchscreen
		7 speakers	15 speakers, 1 subwoofer	Standard



National Consumers League
1701 K Street, NW, Suite 1200
Washington, DC 20006
Visit us online at nclnet.org.