



August 18, 2004

National Highway Traffic Safety Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

RE: Long Range Strategic Planning
NHTSA Docket No. 2004-17794

To Whom It May Concern:

AAA appreciates NHTSA's invitation to offer recommendations on its long-range strategic plan.

We are encouraged with the recent statistics showing a slight decline in motor vehicle fatalities, but we must remain committed to a consistent broad-based effort to reduce fatalities and injuries by even greater numbers. Traffic deaths should be viewed as an epidemic—a disease that is killing over 42,000 people each year and injuring three million more. There is no single solution combating this disease or single entity that holds the answer. Improving motorist safety must be a collaborative effort shared by the traffic safety community that results in safer drivers, driving safer vehicles on safer roads.

Traffic safety improvements require a multi-faceted approach incorporating sound science, research and engineering principles that will yield safety improvements impacting the motorist, vehicle and driving environment. The questions raised in this notice cover a broad range of topics, many of which are better addressed by others directly involved in cutting edge technology and traffic safety research. Our comments highlight several critical safety issues facing the nation and provide an overview of AAA's primary traffic safety initiatives designed to address these issues through advocacy, communication, and public outreach programs by our clubs across the country. The following summary is not intended to cover all of the traffic safety programs managed by individual clubs at the state and local level, or AAA's other safety concerns and interests. This overview simply provides a snapshot of our primary campaigns with the hope that our work can be aligned at the federal and state level. We look forward to reviewing NHTSA's final document as a result of this planning process.

I. Senior Mobility

Seniors are among the most vulnerable road users with the highest crash death rate per mile of everyone except teenagers. This population segment is overrepresented in intersection crashes, and senior pedestrians are up to five times more likely to die in these crashes than any other age group. Keeping seniors safely mobile for a longer period is a cornerstone of AAA's senior

mobility initiative, *Lifelong Safe Mobility*. AAA endorses the strategies outlined in the 2003 Department of Transportation report *Safe Mobility for a Maturing Society: Challenges and Opportunities* to meet the transportation and mobility needs of seniors. This plan offers a blueprint for developing a transportation system that recognizes the unique challenges of aging and encompasses all transportation modes. Ensuring a safe and mobile transportation system for seniors requires contributions from transportation groups representing all modes, but also technical expertise from medical and public health officials specializing in geriatric studies, social service professionals, state and local community planners, and ongoing research from academia and scientific institutions.

Senior mobility must be a focal point of any long-term planning document. AAA encourages NHTSA to incorporate the recommendations outlined in the 2003 DOT report as part of its strategic plan. For its part, AAA will be leading a targeted multi-faceted initiative throughout the country with the goal of keeping seniors mobile for as long as possible.

II. Child Passenger Safety

Children 14 years of age and under are also over-represented in motor vehicle crashes. Data show that the single most effective measure to prevent the likelihood of death or injury in a motor vehicle is using an appropriate child restraint system. Significant progress has been made improving the usage rates for infants, but more can be done to increase appropriate restraint use for toddlers and children ages 4-18, as well as efforts to minimize misuse of restraints. Combined efforts to educate policymakers, parents and caregivers have led to more effective state laws and regulations as well as increased public awareness on the importance of selecting, installing, and using the appropriate child restraint system. Despite this notable progress, a recent study using FARS data suggests that older children are more likely to be unrestrained than their younger counterparts. In 2002, overall restraint use for children 10-14 years of age was 76 percent, significantly less than the ninety and above percentage rates for infants and toddlers. Concentrated activities to improve usage rates among this age group are critical.

AAA is also actively working to address restraint use challenges associated with minority populations. At the national level, AAA has conducted focus groups with Latino communities to probe perceptions about restraint use. In addition, the AAA Foundation for Traffic Safety is in the process of collecting information and developing guidelines for creating better traffic safety educational materials for Latinos.

AAA encourages NHTSA to continue and expedite its research projects required by Anton's Law. We also would like to see a concentrated focus by NHTSA to resolve many of the compatibility issues between child restraint systems and the LATCH system.

III. Teen Drivers

Because teen drivers have the highest crash risk per vehicle mile traveled of any age group, we commend NHTSA for their efforts to improve the safety of this high risk group. AAA has been a strong supporter of Graduated Drivers Licensing (GDL) and AAA clubs have been instrumental in passing GDL laws in most states. However, more must be done to reduce the number of teenage crashes.

AAA encourages the agency to pursue in-depth research on novice drivers and to determine the components needed for more effective driver education.

IV. Driver Distraction

Driver distraction is a major contributor to highway crashes. And it is presumable to expect driver inattention to increase with the proliferation of in-vehicle technology.

AAA believes that ongoing research identifying the relationship between the operating features of advance automobile navigation features and driver reaction is critical.

V. Alcohol

AAA members consistently rank drunk drivers as one of their top three safety concerns. NHTSA's report, *Initiatives to Address Impaired Driving*, provides an overview of the agency's current programs and recommendations for future implementation. The report illustrates the complexity of issues that contribute to implementing effective drunk driving counter measures and should be taken under consideration as part this strategic exercise. A multi-faceted approach supported and endorsed by legal, medical, behavioral, and law enforcement professionals is critical to reducing alcohol related fatalities.

AAA believes that as part of its long-range planning NHTSA should lead or facilitate federal activities to:

- *Provide guidance to help states reinvigorate drunken driving task forces and develop a model for a state drunk driving control program;*
- *Establish performance measures for state drunk driving enforcement and adjudication;*
- *Establish methods by which states can assist each other in assessing their drunken driving laws or court procedures; and,*
- *Establish a clearinghouse for standards and improvements in state record systems.*

VI. Vehicle and Equipment

We believe that the following are all appropriate components to any strategy aimed at reducing traffic injuries and fatalities:

- Prevention of crashes through advanced driver assistance systems and collision avoidance systems, currently being addressed by the Intelligent Vehicle Initiative;
- Reduction of injuries of all levels of severity through improved vehicle structural crashworthiness, improved restraint systems for occupants of all ages and sizes, and improved vehicle-to-vehicle crash compatibility; and,
- Accelerated emergency response time facilitated by automatic crash notification and future enhancements of such technology.

AAA urges NHTSA to continue to foster and promote sound scientific research as part of its comprehensive transportation safety agenda.

VII. Other priorities

Three additional areas that apply to all of AAA's priority issues are: seat belts, data collection and international harmonization.

Seat Belts: Increasing seat belt usage rates is the most effective countermeasure for reducing motor-vehicle related fatalities and injuries. AAA continues to support federal programs to encourage states to pass primary seat belt laws and promote increased seat belt usage. We're also actively engaged in education and outreach efforts to improve seat belt usage rates in the Latino community. AAA will continue to identify areas for improving seat belt usage through our continued representation on national boards and research committees. Enacting primary seat belt laws at the state level remains a legislative priority for AAA clubs nationwide.

Data: The National Center for Statistics and Analysis, as well as both the Policy/Evaluation and Traffic Safety Programs departments have been extremely helpful to AAA in providing data on seniors, primary seat belt laws, and other areas of interest to our 47 million members. Data collection and analysis, with useful dissemination to the public, should continue to be strengthened and maintained as a priority for NHTSA.

International Harmonization: AAA works closely with our international federation of motor clubs as well as the FIA Foundation as our members travel all over the world. We encourage the NHTSA to further relationships with international traffic safety entities as well as continue to strive towards greater international harmonization. In an increasingly global society, we can greatly benefit from the safety experience of our international colleagues, and it is our obligation to share our expertise with other countries to create a safer transportation system for all travelers.

Conclusion

NHTSA and AAA have worked closely together for many years to promote traffic safety. We are confident that the agency's future safety priorities and strategic blueprint will provide new opportunities for continued collaboration.

Sincerely,



Kathleen Marvaso
Managing Director
Government Relations/Traffic Safety Policy