



Owner-Operator Independent Drivers Association

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November 26, 2012

The Honorable David L. Strickland
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Administrator Strickland:

On behalf of the nearly 150,000 members of the Owner-Operator Independent Drivers Association, we respectfully reiterate our request for the National Highway Traffic Safety Administration (NHTSA) to conduct comprehensive research on how improvements to cab crashworthiness standards for tractor/truck cabs in excess of 26,000 pounds can help save hundreds of lives every year. As you are aware, currently there are limited standards dictating the construction of tractor/truck cabs, leaving professional truck drivers at risk for injury or death, even in the lowest of impact crashes, as truck cabs become lighter and lighter while efforts to increase truck weight grow more concerted. As such, we applaud the language handed down in MAP 21 requiring comprehensive analysis on improving crashworthiness standards, and look forward to NHTSA's recommendations in this area.

As a result of the lack of even the most basic standards, common sense and inexpensive safety enhancements, such as air-bags, have been overlooked for decades, while supposed safety technologies for the vehicle have been prioritized. While accident prevention is important, so is the life of a driver carrying the load. NHTSA must recognize that accidents, regardless of prevention investments, will happen. When a cab virtually disintegrates upon impact, a driver's life is unfairly at risk. Frankly, we owe the hard working men and women behind the wheel a great deal more protection, and it is our hope that NHTSA will not squander this opportunity.

The Federal Motor Carrier Safety Administration (FMCSA) found that approximately 700 truck drivers have lost their lives each year for the last 10 years in either single or multi-vehicle large truck crashes. As you are aware, accidents involving truck rollovers are among the most deadly as they account for approximately 63% of fatal injuries to truck occupants. It should go without saying, that the highest priority in any crash should be protecting human life, considering it was estimated that fatalities can be reduced by 23% annually if cab structural integrity is sufficiently improved to prevent crushing in the event of a rollover. We believe that improvement in cab structural strength and enhancements such as air bags may achieve significant benefits in reducing severe injury or death among truck occupants and therefore deserve adequate research and thoughtful consideration.

Again, the most promising countermeasures to improve the post-crash safety of occupants include:

- Improved cab structure to provide occupant sufficient survival space
- Occupant restraints (seat belt and airbags – with most studies agreeing that restraint systems are the most effective of all protection countermeasures)
- Improved strength for windshields and doors (to ensure occupant retention)
- More forgiving interior surfaces (padded interior, energy absorbing steering column, etc.)

Our Organization is certain that improvements in truck occupant safety are achievable. We support research as the basis for potential crashworthiness standards for commercial trucks with GVWR of more than 26,000 pounds, and believe that NHTSA research in this area will contribute to the development of standards that will safeguard truck drivers. We look forward to working with NHTSA on this effort.

Sincerely,

A handwritten signature in cursive script that reads "Todd Spencer".

Todd Spencer
Executive Vice President