



VERITY NOW

Comment Period Toolkit

March 2022

Dear Supporters,

We need your help to demand that the DOT and NHTSA require the equal use of female crash test dummies in all of the same testing seating positions as male dummies.

Recently, NHTSA released a proposal to update their NCAP 5-Star Safety Rating program to make it safer for all, which recommends updating crash testing standards for men, but ignores any safety updates for women. This must be updated on the basis that women have different body types than men and in turn, their bodies respond differently in crashes.

Fortunately, we have an opportunity to provide formal written feedback to NHTSA. The government has asked the [public for comments](#) (through May 9th) on their proposal. We need to capitalize on this opportunity, when the government is listening, to show the broad support of our issue. The time to make our voices heard is now!

This toolkit provides concrete steps for how to submit a formal comment to NHTSA on their NCAP proposal. The more comments we can submit in support of our issue, the more likely our collective voices will be heard.

If you have any questions, please reach out to our team at info@veritynow.org.

Thank you,
The VERITY NOW Team

Overview

VERITY NOW strives to achieve **gender equality in vehicle safety** by advocating for crash testing standards that protect every body. We are a group of people (this includes you!) who are coming together to voice our concern about the inequities in vehicle safety – and talk to policymakers in the U.S. who have the power to fix them.

Women are 17% more likely to die in a vehicle crash and 73% more likely to be seriously injured than men. This is unacceptable. Women should be represented in all the same crash tests with equal technology as men. We need to update vehicle crash testing standards and practices to better understand the safety needs of women.

Technologies exist that can give us a more accurate understanding of how all vehicle occupants are impacted in a crash. These technologies employ sensors and other advanced tools to create better data, which will lead to better vehicle designs that account for **every body. It is time to deploy these technologies to help save lives.**

End Goal

Our goal is to ensure the **Department of Transportation** adopts the **THOR 5th** generation of female crash test dummies in **all seating positions** in every current auto safety test where men are tested. We can accomplish this by advocating for change among key decision makers and their influencers.

New Car Assessment Program (NCAP) Proposal

- **The National Highway Traffic Safety Administration (NHTSA) — a department of the Department of Transportation (DOT) — has the authority to require auto manufacturers to use the most up-to-date female crash test dummies available.** But they haven't acted on that authority even though their own data proves there is a gender safety disparity.
- NHTSA recently released its proposal for updating the New Car Assessment Program (NCAP), which is their voluntary 5-Star Safety Rating program. It proposes improving the quality of testing for men but does nothing to improve crash testing for women. This will inevitably widen the safety gap even further.
- They have opened the proposal to the public for comments until May 9th. Now is the time to add your comment addressing your concerns on this issue and make your voice heard!

The screenshot shows the Federal Register page for the New Car Assessment Program proposal. At the top, the National Archives and Records Administration logo is visible on the left, and the Federal Register logo is in the center. Below the logo, the text reads "The Daily Journal of the United States Government". On the right, there is a circular seal for the National Archives and Records Administration. A blue bar at the top right contains a "Notice" icon and the word "Notice".

The main heading is "New Car Assessment Program". Below it, a sub-heading reads "A Notice by the National Highway Traffic Safety Administration on 03/09/2022". A notification bar states "This document has a comment period that ends in 46 days." A large green arrow points from this notification to a green button labeled "SUBMIT A FORMAL COMMENT". Below the button, it says "Read the 22 public comments".

The page is divided into two main sections: "PUBLISHED DOCUMENT" and "DOCUMENT DETAILS".

PUBLISHED DOCUMENT:

- AGENCY:** National Highway Traffic Safety Administration (NHTSA), Department of Transportation (DOT).
- ACTION:** Request for comments (RFC).
- SUMMARY:** NHTSA's New Car Assessment Program (NCAP) provides comparative information on the safety performance of new vehicles to assist consumers with vehicle purchasing decisions and to encourage safety improvements. In addition

DOCUMENT DETAILS:

- Printed version:** PDF
- Publication Date:** 03/09/2022
- Agencies:** National Highway Traffic Safety Administration
- Dates:** Comments should be submitted no later than May 9, 2022.
- Comments Close:** 05/09/2022
- Document Type:** Notice
- Document Citation:**

[Click Here To Submit a Comment](#)

Steps to leave a comment

Step 1: Click [HERE](#) to view the NCAP proposal

Step 2: Click the green “Submit a formal comment” in the upper right-hand corner

Step 3: Leave a comment by sharing your story and/or telling them what you would like to see included. Make it personal, but if you need ideas we have some in the next couple of slides.

Step 4: Select **Amendment/Revision** for the “What is your comment about?” section and select the option that best fits who you are.

Step 5: Select **Submit Comment**

The screenshot shows the Federal Register website interface. At the top, there are logos for the National Archives and the Department of Justice, along with the text 'FEDERAL REGISTER' and 'The Daily Journal of the United States Government'. A blue navigation bar contains a 'Notice' button. The main content area features a notice titled 'New Car Assessment Program' with a sub-header 'A Notice by the National Highway Traffic Safety Administration on 03/09/2022'. Below the notice title, a green arrow points to a green button labeled 'SUBMIT A FORMAL COMMENT' and a link to 'Read the 22 public comments'. The bottom section of the page is divided into 'PUBLISHED DOCUMENT' and 'DOCUMENT DETAILS'. The 'PUBLISHED DOCUMENT' section includes fields for 'AGENCY:' (National Highway Traffic Safety Administration (NHTSA), Department of Transportation (DOT)), 'ACTION:' (Request for comments (RFC)), and 'SUMMARY:' (NHTSA's New Car Assessment Program (NCAP) provides comparative information on the safety performance of new vehicles to assist consumers with vehicle purchasing decisions and to encourage safety improvements. In addition). The 'DOCUMENT DETAILS' section includes 'Printed version: PDF', 'Publication Date: 03/09/2022', 'Agencies: National Highway Traffic Safety Administration', 'Dates: Comments should be submitted no later than May 9, 2022.', 'Comments Close: 05/09/2022', 'Document Type: Notice', and 'Document Citation:'.

General Comment Example

Below is an example of a comment you can share to express your concern with the proposal ignoring updates to improve vehicle safety for women. **Please adapt messaging to be in your own words.**

Example Comment # 1:

“Women are at a higher risk of serious injury and death due to unequal crash testing standards in NCAP. This proposal does not include updates to female crash test dummy requirements which could save thousands of lives each year. If a goal of the strategy is to improve the safety for all, women’s bodies must be considered in all of the same seating positions as male crash test dummies. As it stands, the strategy includes potential updates to the male dummies, but fails to address any potential updates for the female dummy. This will widen the safety gap even further. NCAP must require the same quality of equipment and tests for female crash test dummies, meaning the THOR 5th female crash test dummy must be required in all of the same tests as men.”

You are submitting an official comment to Regulations.gov.
Comments are due 05/09/2022 at 11:59 pm EDT.

regulations.gov
close comment form

Thank you for taking the time to create a comment. Your input is important.

Once you have filled in the required fields below you can preview and/or submit your comment to the Transportation Department for review. All comments are considered public and will be posted online once the Transportation Department has reviewed them.

You can view alternative ways to comment or you may also comment via Regulations.gov at, <https://www.regulations.gov/commentor/NHTSA-2021-0002-0001>.

Comment*
..

Women are at a higher risk of serious injury and death due to unequal crash testing standards in NCAP. This proposal does not include updates to female crash test dummy requirements which could save thousands of lives each year. If a goal of the strategy is to improve the safety for all, women's bodies must be considered in all of the same seating positions as male crash test dummies. As it stands, the strategy includes updates to the male dummies, but fails to include updates for the female dummy. This will widen the safety gap even further. NCAP must require the same quality of equipment and tests for female crash test dummies, meaning the THOR 5th female crash test dummy must be required in all of the the same tests as men.

What is your comment about? AmendmentRevision

Upload File(s) + Add a file Note: You can attach your comment as a file and/or attach supporting documents to your comment. Attachment Requirements.

Email
this will NOT be posted on regulations.gov
 Opt to receive email confirmation of submission and tracking number?

Tell us about yourself! I am...*
..

An Individual An Organization Anonymous

You are filing a document into an official docket. Any personal information included in your **comment text and/or uploaded attachment(s)** may be publicly viewable on the web.

Example for Survivors

*Example if you are women who has been in a crash, or if your loved one has been injured in a crash. **The example below describes the crash and the impact on the survivor. Please only use your own story in your comment.***

"In October 2020, I was struck by a car while in the drivers seat involving in a multi-car collision in Nashville, TN. I broke 10 ribs, several of which were crushed in multiple places, puncturing my lung, stomach and diaphragm along with rupturing my spleen. After many surgeries, they eventually rebuilt my rib cage making it possible for me to eventually breathe on my own. This traumatic experience that has impacted my physical and emotional well-being could have potentially been avoided had my vehicle been crash tested with a women in the drivers seat. The technology exists, so why is it not required in the updated strategy? NCAP must require the same quality of equipment and tests for female crash test dummies, meaning the THOR 5th female crash test dummy must be required in all of the same tests as men."

Example for victims' loved ones

*Example if you are the friend or family member of a woman who was needlessly killed in a car crash. **The example below describes the crash and the impact on the crash victim's family. Please only use your own story in your comment.***

"Five years ago, on March 31, my sister, and best friend, Sarah died in a car accident. I called our mom (there is nothing in this world harder than telling a mother her child has died), planned her funeral, contacted her friends, sorted her pictures and did the million other tiny things that come with the unexpected death of a loved one. The impact of the crash crushed her lungs and caused her to die immediately. It saddens me to know that many other women are dying for the same reasons, simply because car manufactures are not required to crash test cars with dummies modeled after a female's body.

For my sister, Sarah, and for all of the others who have needlessly died in a car accident due to this gender bias in crash testing standards, I'm asking that the NCAP Five-Star Safety Rating program require the use of female crash test dummies in all of the same seating positions as men."

Example For Gender Equality Activists

*Example if you are passionate about gender equality. **Please adapt messaging to be in your own words.***

"Women deserve equality in the driver's seat, just as they do everywhere else. The fact that about 1,300 women die each year in car accidents and are 73% more likely to be injured than men in a car accident should be enough reason to require equal quality of crash testing equipment and standards as men. It is 2022, women drive too and deserve to feel peace of mind every time they get into a car. On behalf of women everywhere, please update the proposal to require the THOR 5th female crash test dummy in the proposed strategy and end this government-imposed gender discrimination immediately."

Over 1,300 women die needlessly every year due to outdated crash test standards.

**17%
to 18.5%**

Women are 17-18.5% more likely than men to die in a vehicle crash because of outdated crash test standards.

1,342

The number of women who die needlessly every year that crash test standards are not updated.

**\$2.25
billion**

Economic loss associated with those deaths.

No NCAP safety rating crash test requires a female crash test dummy to be tested in the driver's seat.

76%

The rate of injuries sustained by women in the driver's seat during vehicle crashes.

73%

How much more likely women are to sustain a serious injury than men in a car crash.

**\$12.8
billion**

The economic impact of 466,643 preventable injuries to women in car crashes.

0

The number of crash tests simulating women in the driver's seat that is required to achieve an NCAP safety rating.

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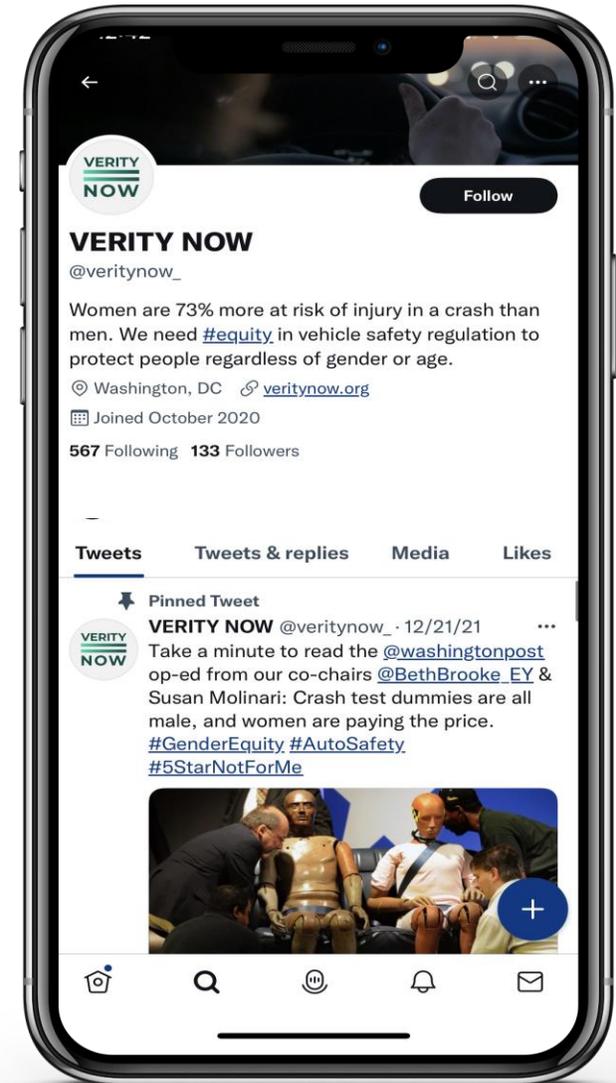
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THANK YOU!