

January 7, 2020

The Honorable Robert L. Sumwalt  
Chairman  
National Transportation Safety Board (NTSB)  
490 L'Enfant Plaza, SW  
Washington, DC 20594

RE: Request for NHTSA Truck Side Guard Requirement

Dear Chairman Sumwalt,

On behalf of the agencies of the City of New York working towards eliminating deaths and serious injuries through our Vision Zero initiative, we would like to thank the National Transportation Safety Board for your leadership in exploring safety interventions in the Bicycle Safety Research Report. As we promote cycling as a safe, sustainable, healthy transportation option, we appreciate having a strong voice in Federal government concerned with further improving rider safety.

This year, we have seen an unfortunate increase in the number of cyclist deaths in New York City. Approximately half of these deaths involved large trucks. These vehicles are also over-represented in pedestrian deaths and serious injuries, and many trucks suffer from design flaws that both increase the likelihood of collisions and worsen the harm to vulnerable road users in the event that one takes place.

There are numerous interventions that can reduce serious collisions involving trucks and cyclists, and we have found that the installation of sideguards on large trucks is an affordable, cost-effective solution to preventing a common type of fatal crash in which the cyclist is pulled beneath a truck's rear tires. For this reason, we are installing sideguards on all eligible trucks in our City fleet, and have mandated their usage on the hundreds of private sanitation trucks operating within New York City.

In 2017, our Department of Citywide Administrative Services (DCAS), which administers the municipal fleet of over 30,000 vehicles, created a Safe Fleet Transition Plan in partnership with the USDOT Volpe National Transportation Systems Center in order to lead by example in the procurement of safer vehicles. This document was updated in 2018 and focuses on improving driver visibility and reducing the potential for collisions. The Plan outlines the City's ongoing transition to using trucks that minimize blind spots by lowering the height of the cab, using additional windows, and reducing the size and height of the truck's hood. In addition, the Safe Fleet Transition Plan has resulted in the implementation of thousands of automated braking systems, backup cameras, driver alert systems, blind spot alerts, and vehicle telematics systems.

We respectfully request that NTSB consider adding to the final Bicycle Safety Research Report a request for the National Highway Traffic Safety Administration to adopt a set of national standards that require side guards on large trucks and tractor-trailers, as well as a longer-term vision for making high-visibility truck cabs the default option.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Kerman', with a stylized, sweeping flourish at the end.

Keith Kerman  
Chief Fleet Officer and Deputy Commissioner  
New York City Department of Citywide Administrative Services

A handwritten signature in blue ink, appearing to read 'Michael Replogle', with a stylized, sweeping flourish at the end.

Michael Replogle  
Deputy Commissioner for Policy  
New York City Department of Transportation