

KidsAndCars.org, consumer, health and safety organizations along with numerous victims and survivors of backover incidents strongly support the pending rear visibility standard written by the Department of Transportation (DOT). The DOT proposal addresses a serious and deadly public health and safety problem that affects every driver and pedestrian in this country.

Background

The issue of compromised rearward visibility is not new to the automobile industry, but the collection of data and identification of backovers as a significant cause of the injury and death was not recognized on the national agenda until KidsAndCars.org was able to quantify the numbers of children being backed with a significant spike in fatalities in 2003. Due to the incredibly catastrophic nature of children being backed over and most frequently by a family member, it is imperative to utilize existing technologies to prevent these tragedies.

The Cameron Gulbransen Kids Transportation Safety Act, a bi-partisan bill, was passed unanimously by both houses of Congress and signed into law by President Bush on February 28, 2008. Secretary of State Hillary Clinton was the Senate leader with Republican Senator John Sununu (R-NH). Representative Jan Schakowsky (D-IL) and Representative Peter King (R-NY) were House sponsors and lead the efforts to insure that our vehicles would be made safer in the future. This rule-making is the result of Congress recognizing the need to help protect young children and others due to the lack of visibility behind all motor vehicles.

The auto industry supported the final bill negotiated with safety and consumer groups, so we find it puzzling that they would now be criticizing the proposed rule since they have publicly endorsed the bill.

Data

The data provided by NHTSA regarding the number of backover deaths and injuries vastly underestimates the true magnitude of this public health and safety issue. Segmenting fatalities and injuries based on location of death verses manner of death results in an incomplete picture of this issue. The attached chart shows an example of how backover fatalities that place on a sidewalk are **excluded** from the NHTSA database, though the pattern of injury is exactly like what takes place in the actual driveway.

Police records, emergency rooms, drop-in clinics record these types of incidents in a variety of ways. A specific E-CODE is needed to bring clarity to how often a backover occurs, but in the absence of good data, we know the numbers used by NHTSA are significantly under estimated.

Costs

The costs used to calculate how much adding this technology to vehicles is over-stated. Additionally, with the regulation in place, the economies of scale will most certainly bring down the prices even further. Factors include:

- Falling prices of technology
- Navigation screens already present in vehicles which results in only the cost of a camera being installed
- The figures used to calculate the overall cost to implement the new rule include all new vehicles. Since 45 percent of all vehicle models already have a rearview camera as standard equipment, it would not be accurate to count that as a 'cost' related to the rule. Though NHTSA used a baseline, we know the overall cost is somewhat overstated because that is a moving target.
- Significant savings should be realized by a decrease in bumper repairs. A 5-mile per hour bumper crash testing reveals that the cost to repair the back bumper is in the thousands of dollars.

Consumer Demand

The reason 45% of 2012 vehicle models now come with rearview cameras as standard is because more drivers are learning about how large the blindzone is behind vehicles and want to protect their families and property from a backover mishap. Rearview cameras are popular and drivers really like them.

Model Year	Backup Camera
2001	0
2002	1
2003	3
2004	11
2005	18
2006	31
2007	69
2008	108
2009	140
2010	187
2011	228
2012	245

Implication of Jobs Lost

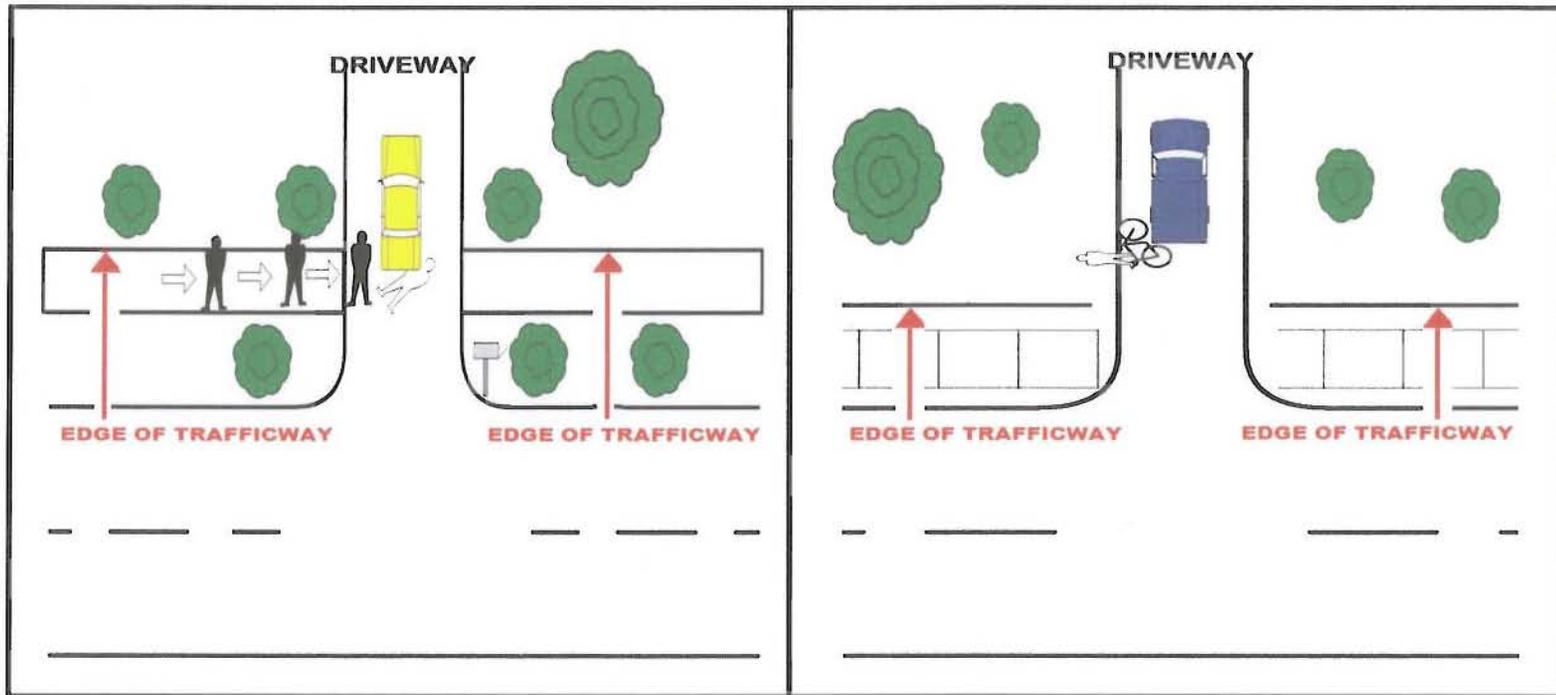
We do not understand that the assertion that jobs will be lost due to the addition of rearview cameras as stated by auto makers and others. But to say that fewer vehicles will be purchased due to a slightly higher cost, is fiction. This has been the stance of the automotive industry for decades. Airbags are a perfect example of a regulation that was opposed due to cost, but now the industry has embraced this feature and even advertises the safety benefits of airbags. Rearview cameras are now the feature of many current commercials even though they currently isn't a mandate in place. Safety sells.

Gentex is a company located in Zeeland, Michigan known for their high quality rearview mirrors. They have embraced the importance of rearward visibility by adding a monitor in their rearview mirrors. Sixty three (63) vehicle models currently feature their product. This US based company has increased their sales of rearview mirrors with monitors from 1.25 million units to a projected sales volume of 1.7 million units this year. Their 40% growth in sales has caused them to hire 1000 new employees in the last year.

Child Deaths

The toll on families whose child is vibrant, full-of-life and happy one moment and is dead in one second is unimaginable. In 70% of the fatal incidents it is a direct family member who is responsible for backing over and killing the child. The age of children most at risk are 1-year-olds (12-23 months).

Traffic Versus Nontraffic Backover



Traffic Crash: Included in FARS and NASS-GES

Nontraffic Crash: (private property)
Not currently included in FARS or NASS-GES

36 Burnham Place
Manhasset, NY 11030
December 7, 2011

The Honorable Jacob Lew
Director
Office of Management and Budget
9104 New Executive Office Building
725 17th Street NW
Washington, DC

Dear Director Lew,

I am very disappointed to be unable to attend the important meeting between KidsAndCars.org and the Office of Management and Budget to discuss the regulation regarding rearward visibility on motor vehicles. In lieu of being present, I am writing to share with you some insight into how a backover personally affects a family and why it is so important that rear view cameras become standard equipment on all passenger vehicles in the United States.

My daughter Kate is a survivor of a backover in which I was the driver. I had heard of backovers before. I read the stories in the news. I can attest to the mentality that the vast majority of parents have that, "This would never happen to me," and tell you that I was no different prior to our incident. As a survivor advocate, a great focus of my life now is to educate others about backovers and how they can be prevented. One of the biggest hurdles I try to overcome is to help parents and drivers realize that backovers don't discriminate between so-called good parents and bad parents. It is a lack of rearward visibility that is the major contributing factor.

While I am thrilled to see so many vehicles being manufactured with rear view cameras as standard equipment currently, one has to question, "What about the other 55% of the vehicles?" While our education efforts are beginning to pay off and more consumers are opting to add a rear view camera when they purchase a vehicle, the concern is that far too many parents will say, "Oh, that would never happen to me." This leaves too many precious children vulnerable in the large blindzones of vehicles and sets families up for unthinkable tragedies. We must protect ALL children from being backed over.

While I respect the procedures that are in place to assure that our government makes educated and fiscally responsible decisions based on facts when issuing regulations, I must question putting a price tag on the life of a child. In particular I question how the value of the life of a child could possibly be equal to that of an 80-

year-old person who has lived a long full life. I question how one can measure the devastation a family and an entire community suffer when a parent or close relative is the person responsible for taking the life of a very young child in such a tragic manner. I encourage you to consider the life of a child as having a different value because of the potential that will never be fulfilled if that child dies and because of the extreme devastation that child's death would cause so many people.

Again, with respect for protocols that exist, I must question how calculations are made as to the fiscal impact of issuing a regulation that makes rear view cameras standard on all passenger vehicles. When calculations are done it must be taken into account that 45% of model year 2012 vehicles already have rear view cameras as standard equipment. Therefore to calculate the financial impact by multiplying out over the entire fleet of vehicles is simply flawed logic.

Furthermore, the actual cost of the rear view camera will most certainly be factored into the price of a vehicle and not, as the auto industry has claimed, be an expense for automakers. This cost, between \$58 and \$203 per vehicle, is not a cost that will make or break a family's finances. However, losing a very young child, in 70% of cases at the hands of a close relative, is a "cost" that has no number that can be associated with it. Not a day goes by that I don't look at my daughter and think of what life would be like had I lost her that day. I have come to know many families who have suffered this type of unthinkable tragedy and can assure you, they would gladly pay any price to have their child with them today.

In conclusion, I urge you to grant the necessary approvals so that the National Highway Traffic Safety Administration (NHTSA) can issue the regulation regarding rearward visibility as it is currently written, requiring rear view cameras on all new vehicles. This regulation is the result of many years of hard work by many individuals, advocates and professionals. It is the result of several years of research on the part of NHTSA to fully understand the issue of backovers and countless hours and pages of testimony and public comment. The final result will be an effective regulation that will prevent young children from being backed over by motor vehicles.

I thank you for taking the time to meet with KidsAndCars.org and I thank you in advance for your part in ensuring that backovers become a thing of the past by assuring that drivers can see behind their vehicles when backing and families do not have to suffer the tragic loss of a child due to a backover.

Sincerely,

Susan H. Auriemma