



March 4, 2024

ANPRM: Advanced Impaired Driving Prevention Technology
Docket: NHTSA-2022-0079

Sophie Shulman
Acting Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building
Washington, DC 20590

Dear Acting Administrator Shulman:

Families For Safe Streets (FSS) respectfully submits this comment on behalf of our thousands of members who have all lost a family member or suffered a serious injury in a traffic crash. Our mission is to confront the preventable epidemic of traffic violence by advocating for life-saving changes and providing support to those who have been impacted by crashes. We share our stories to fight for legislative and policy change so that no one else has to experience our unimaginable heartache.

We are writing to convey our strong support for the Honoring Abbas Family Legacy to Terminate Drunk Driving Act or HALT Drunk Driving Act urge rapid implementation of the mandate for advanced impaired driving prevention technology. Impaired driving is a persistent traffic safety issue that has contributed to nearly one-third of all traffic deaths annually over the past decade. Given the unacceptably high cost to society of these preventable deaths, passive detection technology—a solution that is available, effective, and gravely needed—should be required technology for all new vehicles. **This technology has the capacity to address those impaired or distracted in many ways, whether it be from alcohol, prescription drugs, illicit substances, drowsiness, cell phone use, or the large consoles now prominent in most new vehicles.**

FSS strongly supports a Safe Systems Approach, which acknowledges that humans make mistakes and so our transportation system must be designed in such a way as to accommodate certain types and levels of human mistakes, such as drunk and impaired driving. Drunk and impaired driving prevention technology is a critical way that we can improve our transportation

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Families for Safe Streets (FSS) confronts the epidemic of traffic violence by advocating for life-saving changes and providing support to those who have been impacted by crashes. Comprised of individuals who have been injured or lost loved ones, FSS was founded in 2014 in New York City and is growing as a national movement with chapters across the country.

system so that it anticipates and responds to the reality that some people will try to drive while impaired. Advanced Impaired Driving Prevention Technology is one of the most promising newly available layers of protection that will make vehicles and people safer.

According to research from the Insurance Institute for Highway Safety (IIHS) released in July of 2020, impaired driving prevention technology has significant potential to address the crisis on our roadways in a meaningful way; IIHS found that alcohol-detection systems could save thousands of lives a year in the U.S., accounting for more than 25% of all roadway deaths.

Moreover, impaired driving prevention technology enjoys widespread support. New research published earlier this month in the Journal of the American Medical Association (JAMA) measured public opinion about using mandatory technology to combat impaired driving. This research showed that most Americans support a requirement for all new passenger vehicles to be equipped with impairment detection systems. In addition, The nationwide survey, "Public Support for Vehicle Technology to Prevent Operation by Impaired Drivers," conducted by researchers at the Johns Hopkins Bloomberg School of Public Health, found that nearly two-thirds of respondents, almost 65%, agreed that driving impairment prevention technology should be standard in all new vehicles.

USDOT simply can't continue to assume that impaired motorists can or will make rational decisions about their ability to operate a vehicle safely; relying on impaired individuals to make sound decisions about driving has killed far too many road users – including so many of the loved ones killed in crashes amongst our membership. If USDOT is serious about its commitment to eliminating traffic deaths on our roadways, it is imperative that they intervene by requiring impaired driving prevention technology in all new vehicles.

A life lost to an impaired driver is an unimaginable loss in and of itself; however, a true accounting must include the life-sentences of debilitating grief imposed on the victim's families and friends as well as the loss to the community of the victim's gifts and potential contributions. As we all know all too well, it is a heartache that never goes away.

The widespread adoption of vehicle safety technology to prevent impaired driving will play a significant role in decreasing both incidence and broad resultant suffering. We urge accelerated progress in deploying technological solutions to reduce impaired driving and engender meaningful reductions in crashes, deaths, and injuries.

We strongly urge NHTSA to take immediate action to meet the HALT Drunk Driving Act Rulemaking deadline of November 2024 and require the most comprehensive system to address drunk, drugged and distracted driving. This is an historic opportunity for the USDOT to save many thousands of lives, and this rulemaking is an opportunity for USDOT to ensure lifesaving technology is implemented into new cars as soon as possible. **Moreover, we strongly urge USDOT to lead the way and immediately implement impaired prevention technology and other vehicle safety technology such as intelligent speed assistance into its own vehicles.**

Impaired driving is a preventable tragedy that has devastated so many families. There is no reason not to get this lifesaving technology into new cars as soon as possible. So many lives can be saved.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Cohen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Amy Cohen
Co-Founder &
Mother of Sammy Cohen Eckstein
(12/8/00-10/8/13)

A handwritten signature in black ink, appearing to read "Thomas DeVito". The signature is cursive and somewhat stylized, with a prominent "D" and "V".

Thomas DeVito
National Director