

Improvement of Early Warning Reporting Data Collection

I am recommending that the [Early Warning Reporting](#) (EWR) process for data collection be updated to include detailed information on passenger vehicle and pedestrian/cyclist underride/override in crashes with large trucks (truck-tractors, tractor-trailers, and single unit trucks).

If this information had been collected before my daughters died due to a truck underride crash on May 4, 2013, then the Office of Defects Investigation would have been alerted by a red flag and could have chosen to investigate a potential safety defect. Perhaps my daughters, AnnaLeah and Mary, would still be alive today.

Because collection of that information is **not** part of the process, Great Dane Trailers did not report my crash with a Great Dane trailer, on May 4, 2013, as an underride. Perhaps if it *had* been reported as an underride, along with that information in numerous additional rear underride crashes, many more lives would have been spared going forward because of timely and vital action by the NHTSA Office of Defects Investigation, which would have catalyzed important strengthening of underride regulations.

This goes for collisions at the sides and front of large trucks as well.

I have attached the following:

1. The [Trailer EWR Fatality Records](#) report, which I received from DOT in 2018 and which includes my crash on May 4, 2013.
2. A post, [What's the intent of Early Warning Reporting & what's it done to end underride?](#), which I wrote on this subject on June 19, 2018.
3. I have also attached a [Public Comment](#) submitted to the Federal Register [Agency Information Collection Activities: Notice and Request for Comment: Reporting of Information and Documents About Potential Defects](#) by Eric Hein, who is the father of a side underride victim, Riley Hein.
4. A relevant document, [Risk-Based Processes for Safety Defect Analysis and Management of Recalls](#).

If you choose to ignore this important information and recommendations, you will do so in conflict with your mission to reduce roadway injuries and deaths. Underride victims and their families will continue to pay an unimaginable price as a result of your failure to protect the American public.

Respectfully submitted,

Marianne Karth, October 23, 2024