



Donald Trump  
President  
United States of America  
The White House  
1600 Pennsylvania Avenue NW  
Washington DC 20500

19 March 2018

Dear President Trump,

**Re: Pedestrian Protection Automobile Safety Standards**

I am writing in response to your recent remarks about a ‘bowling ball’ test on the hood of passenger cars, which is apparently preventing the sale of American products in Japan<sup>1</sup>. The test to which you refer is in fact a global pedestrian protection standard designed to mitigate the risk of head injury by encouraging deformation of the hood.

Pedestrian protection standards were first applied in the European Union (EU) as part of a 2001 voluntary agreement with the automobile industry which included American manufacturers<sup>2</sup>. This became a mandatory requirement across the EU in 2005 with Japan introducing a similar standard in the same year. Subsequently, a Global Technical Regulation (GTR) Number 9 on Pedestrian Protection was adopted by the United Nations World Forum for Harmonization of Vehicle Regulations (WP.29) under a 1998 Agreement to which the United States of America (USA) is a contracting party<sup>3</sup>.

To date, the USA has not applied GTR Number 9. However, in 2015, the National Highway Traffic Safety Administration (NHTSA) issued a proposal to include pedestrian testing requirements in their New Car Assessment Program (NCAP)<sup>4</sup>. The agency noted in the Federal Register that NCAP testing and regulation in Europe and Japan “have likely contributed to a downward trend in pedestrian fatalities” and argued that “including pedestrian protection in the NCAP program would be a step toward realizing similar downward trends experienced in regions of the world that include pedestrians in their consumer

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<sup>1</sup> <http://www.newsweek.com/donald-trump-bowling-ball-test-japanese-cars-fundraising-speech-nobody-seems-846296>

<sup>2</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52001DC0389&from=EN>

<sup>3</sup> <https://www.unece.org/fileadmin/DAM/trans/main/wp29/wp29wgs/wp29gen/wp29registry/ECE-TRANS-180a9e.pdf>

<sup>4</sup> Federal Register (Vol. 80, No. 241, Part V, 78522 December 16, 2015)

information programs". Regrettably, this proposed update in the US NCAP test requirements has yet to be implemented.

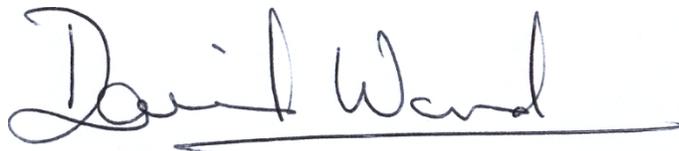
To meet European and Japanese pedestrian protection requirements, the automotive industry has developed effective technology solutions. Notably, a 'pop up' bonnet system is increasingly used to raise the distance between the hood and the hard components in the engine bay, reducing the severity of head injury to the struck pedestrian<sup>5</sup>. A 2015 study by NHTSA on European experience with such hoods confirmed that pop up technologies have achieved better protection scores and commented that "early concerns about prohibitive cost and reliability of pop up hoods did not appear to come to fruition"<sup>6</sup>.

As you will be aware, pedestrian fatalities in the USA have risen for two years in succession, now amounting to 6,000 lives lost per annum and accounting for 16% of total road deaths. Global NCAP strongly agrees with NHTSA's 2015 assessment that improved pedestrian protection in the USA could help reduce the number killed in such crashes each year.

Against this background, the clear solution to the concern you expressed about barriers to the export of US automobiles is for your administration to apply United Nations (UN) GTR Number 9 as a matter of urgency. American manufacturers based in the EU are already meeting these requirements so there is no technological challenge for them whatsoever. Adopting global standards would help both to keep American pedestrians safer and increase the export potential of US manufacturers. Implementing immediately NHTSA's proposed 2015 upgrade to NCAP would also serve the interests of American consumers.

I humbly suggest that this approach is the way to put 'America First' in pedestrian protection rather than languish below global best practice in automobile safety regulations. Global NCAP stands ready to assist your administration with such regulatory and NCAP initiatives to promote pedestrian safety. I look forward to your reply.

Yours sincerely

A handwritten signature in black ink that reads "David Ward". The signature is written in a cursive style and is underlined with a horizontal line.

David Ward  
Secretary General

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<sup>5</sup> <https://www.youtube.com/watch?v=E4hIkEmtZ8U&sns=em>

<sup>6</sup> <https://www-esv.nhtsa.dot.gov/proceedings/24/files/24ESV-000111.PDF>