



January 29, 2013

Administrator David Strickland
NHTSA
1200 New Jersey Avenue, S.E.
Washington D.C. 20590

Re:Docket No. NHTSA-2011-0148

Dear Administrator Strickland,

WalkBoston wholeheartedly supports the requirement that sound be added to electric and hybrid vehicles, as required by the Pedestrian Safety Enhancement Act of 2010 (PSEA) and proposed in NHTSA's rule cited above. When crossing streets and intersections, pedestrians use both ears and eyes to locate approaching traffic and the quiet of these worthy new vehicles presents a real danger. Adding sound is the equivalent of the odor added to natural gas, truck back-up beeps, and jingle bells used on sleighs because sleighs made no noise sliding over snow. You will be continuing a long tradition.

However, having different sounds for different manufacturers makes no sense at all. WalkBoston urges you to establish one warning sound and we suggest it be the motor noise currently recognized and understood by walkers. It would also comply with the language in your notice: "...contain acoustic signal content that pedestrians will recognize as being emitted from a vehicle." The backup beep-beep warning is the same for all vehicles; a forward warning sound should also be uniform. Making walkers learn to identify many sounds is confusing. This should be a safety, not a branding, issue.

In the Pedestrian Committee's discussion of this issue at the Transportation Research Board's January meeting, it was mentioned that there is some professional doubt about the accuracy of the research done so far to justify this proposal. We bring this to your attention because we would hate to have unnecessary delay in achieving this regulation by the PSEA's January 4, 2014 deadline.

WalkBoston is a member-based pedestrian advocacy organization founded in 1990; we now work statewide in Massachusetts. We also co-founded America Walks, the national coalition of pedestrian advocacy groups. WalkBoston advocates for safe and comfortable walking conditions—sidewalks, paths, sidewalks, intersections, crosswalks, signal timing; we also give Safe Routes to Schools trainings in cities and towns across our state and raise consciousness about the health benefits of walking

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and the fact that Good Walking Makes Good Business. In all of these areas, we are national leaders. We enclose our brochure.

Your decision will affect the safety of all Americans, but especially the one hundred million Americans do not drive. In Boston more than 30% of households do not have a car; one quarter of women over 65 don't drive; 20% of the population is too young to drive; many people with physical or mental disabilities are unable to drive, and 50% of all 18- to 34-year-old drivers are driving less.

We urge NHTSA to take prompt action and issue its final rule by the January 2014 deadline. Thank you for your consideration.

Sincerely,

Wendy Landman
Executive Director

Cc all US Reps and Senators, MassDOT and AW list serve, encouraging others