



Ms. Nicole Mathias
New York City Business Integrity Commission
100 Church Street, 20th Floor
New York, New York, 10007

Re: New York City Administrative Code Section 16-500(f), 16-513(a), and 16-526(b)

Dear Ms. Mathias:

This letter is sent by the Truck Safety Coalition (TSC), Citizens for Reliable and Safe Highways (CRASH), Parents Against Tired Truckers (P.A.T.T.), and our volunteers, who are the family and friends of truck crash victims and survivors who have paid the ultimate price for the failure to prioritize truck safety.

The Truck Safety Coalition strongly supports the proposed requirement for Dump Trucks to be equipped with side underride guards to better protect pedestrians, cyclists, and other passenger vehicles. The proposed changes to *Administrative Code Section 16-500(f), 16-513(a), and 16-526(b)* are long overdue and reflect a commitment to life safety. TSC, unfortunately, has multiple families in our coalition who have lost loved ones in Dump Truck related crashes in heavily populated cities up and down the Eastern Corridor, including Philadelphia, New Jersey, and New York City. In 2020, one of our volunteers lost his ten-year-old son and his wife was severely injured when a dump truck struck them in Queens. Side underride guards are proven safety equipment that can save lives and prevent these types of tragedies.

U.S. Department of Transportation Secretary Buttigieg has [declared](#) roadway fatalities a “crisis,” with most recent estimates [forecasting](#) a 12% increase in deaths relative to the previous year. *This is the highest jump in recorded history.* It is incumbent on all stakeholders, including State and City officials, to avail themselves of every available tool to drive down these unacceptable figures. Side underride guards are a vital component of any solution that is heavily supported by over 15 stakeholders supporting the National Safety Council’s [Underride Statement](#), including AAA, Advocates for Highway and Auto Safety, the Vision Zero Network, and many more.

The Truck Safety Coalition encourages the New York City Business Integrity Commission to stand firm and proceed with adding side underride guard requirements for Dump Trucks. Our truck crash victims know all too well the exorbitant cost that is paid when safety is left to chance. No one else needs to endure the pain of losing a loved one from a preventable truck crash.

Sincerely,

Zach Cahalan
Executive Director, Truck Safety Coalition