



March 19, 2025

The Honorable Sean Duffy, Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590

Dear Secretary Duffy:

Consumer Reports (CR), the independent, nonprofit, and nonpartisan member organization dedicated to creating a fair and safe marketplace for consumers, writes in recognition of your new role as Secretary of Transportation. We appreciate the chance to introduce ourselves and to highlight opportunities to collaborate on automotive safety and sustainability.

For over 85 years, CR has leveraged rigorous research and testing, compelling journalism, and data-driven advocacy to advance innovations that protect consumers. We have championed everything from seat belts and crash avoidance technologies to fuel-efficient vehicles that lower costs for families and reduce harmful emissions for communities. Our work has consistently demonstrated that strong safety and efficiency standards help to fuel innovation by challenging automakers to develop technologies that make vehicles safer and more efficient, which delivers lasting benefits for consumers and our broader transportation system. Indeed, as automakers continue to innovate, data shows that prioritizing safety and efficiency [delivers long-term value](#) to both the public and the planet and does not inherently increase costs for consumers.

The U.S. Department of Transportation (DOT) plays a vital role in maximizing these benefits to car buyers and everyone who uses our roads. In particular, steady and supportive leadership from the Secretary's office can greatly help DOT agencies as they carry out their missions. These agencies – staffed by expert public servants who are well equipped to carry out the Department's education, research, standards, and enforcement activities – must be sufficiently resourced if they are to help drive the progress that American consumers rightly expect to see in the future.

Any large-scale reduction in workforce or funding would not only hinder this progress, but also cause severe harm to the Department's ability to enforce consumer protection and safety laws, conduct timely investigations, and oversee compliance actions, such as recalls. Should you determine that staff or funding cuts are necessary, we strongly urge you to avoid damage to these and other vital functions, and hold true to using “the scalpel rather than the hatchet.”

At your Senate hearing on January 15, we were pleased to hear you emphasize the importance – and nonpartisan nature – of transportation safety issues. We agree, and when it comes to roadway safety, we consider it essential for the Department to help ensure that advances in vehicle technology translate to meaningful safety improvements.

Consumer Reports has a long history of testing and reviewing the latest technology in new vehicles, sharing our findings with consumers, and advocating for policies that hold automakers accountable for safety. CR operates the largest independent vehicle testing center in the U.S., evaluating cars, SUVs, and pickups for safety, efficiency, performance, and reliability. Our Overall Score gives particular weight to whether a vehicle comes standard with automatic emergency braking (AEB) and blind spot warning (BSW),<sup>1</sup> which have been shown to reduce crashes and improve safety outcomes – though their availability and performance can vary across models.

Performance discrepancies underscore the need for strong federal standards to ensure all consumers benefit from effective, reliable technology. DOT took an important step last year by finalizing a rule requiring AEB in all new passenger vehicles and light-duty trucks, and it is critical that its implementation stays on track. The Department should stand firm against industry efforts to weaken or delay the rule, such as those currently being [pursued through litigation](#).

Recognizing AEB's importance, Consumer Reports factors it into our [vehicle ratings](#), awarding additional points to models where it comes standard and delivers a minimum acceptable level of performance according to testing by the Insurance Institute for Highway Safety. However, ensuring that AEB and other potentially lifesaving technologies can deliver consistent, high-quality performance across the marketplace requires timely implementation of the AEB rule, continued standards development, and strong enforcement.

Ensuring the safety of people outside the vehicle is equally important as protecting its occupants. Pedestrian fatalities remain at crisis levels, according to National Highway Traffic Safety Administration (NHTSA) data, with an increase of 83% since 2009. In 2022 alone, over 7,500 pedestrians lost their lives, the highest number ever recorded. Including pedestrian detection as a requirement in the AEB rule and incorporating advanced crash avoidance and pedestrian crashworthiness measures into NHTSA's five-star safety ratings represent important steps forward, and these measures should be maintained and built upon. In addition, NHTSA should continue working toward finalizing a proposed rule to reduce the severity of vehicle collisions with pedestrians through new performance requirements for the front of vehicles. According to a November 2024 Consumer Reports nationally representative survey, 75% of Americans said they would [support the proposed rule](#), even if it led to design or styling changes on the front of new large pickup trucks and SUVs.<sup>2</sup>

Emerging vehicle automation technologies are also at a critical juncture, and without robust federal oversight, consumer safety risks being sidelined as industry races towards deployment. NHTSA must ensure that advanced driver assistance systems (ADAS) with partially automated (SAE Level 2) capabilities include effective direct driver monitoring to prevent overreliance and keep drivers actively engaged and prepared to take control at all times. As policymakers consider

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<sup>1</sup> Consumer Reports includes pedestrian detection in AEB scoring and rear cross traffic warning (RCTW) in BSW scoring to reflect their added safety benefits.

<sup>2</sup> Consumer Reports, nationally representative American Experiences Survey of 2,108 U.S. adults (Nov. 2024) (online at: [advocacy.consumerreports.org/wp-content/uploads/2024/12/November-2024-AES-Report-Pedestrian-Safety-Policy-Support.pdf](https://advocacy.consumerreports.org/wp-content/uploads/2024/12/November-2024-AES-Report-Pedestrian-Safety-Policy-Support.pdf)).

a regulatory framework for the deployment of autonomous vehicles (AVs), consumer safety and corporate accountability need to remain central to the conversation. AVs should be required to comply with strong safety benchmarks, especially since [consumers overwhelmingly support](#) robust federal safety standards. According to a December 2024 Consumer Reports nationally representative survey, two out of three Americans think vehicle safety standards should be stricter for AVs than those for traditional passenger vehicles.<sup>3</sup> NHTSA should also maintain and strengthen its program that requires auto manufacturers and AV companies to report certain crashes. Without robust crash reporting requirements, DOT and the public would lose an important tool for understanding and improving the safety of new driving automation technologies.

Beyond vehicle safety, Consumer Reports also underscores the importance of fuel efficiency standards for reducing consumer costs, saving energy, and cutting emissions. Corporate Average Fuel Economy (CAFE) standards are one of the most cost effective consumer protection programs the federal government has ever developed, and we strongly support them. These standards, combined with aligned EPA emissions standards, are delivering [over \\$9,000 in vehicle lifetime fuel savings](#) on new vehicles sold today compared to vehicles on the market in 2001. These savings are being delivered despite vehicles becoming larger, more powerful, and safer. Most importantly, [CR research has shown](#) that all of these benefits are being delivered with no detectable change in vehicle prices to the consumer, after adjusting for inflation.

CAFE standards are not just effective, but according to a nationally representative Consumer Reports survey fielded in August and September of 2024, [they also are popular](#), with nearly two-thirds of Americans (64%) supporting continued increases in fuel economy standards.<sup>4</sup> While 84% of Americans, including a majority of both Republicans and Democrats, agree that automakers should continue to improve fuel economy for all vehicle types, only 27% of Americans believe automakers care about lowering consumers' fuel spending.<sup>5</sup> It is not hard to understand why. Historically, every time the government lets up on standards, [automakers halt progress](#) on delivering more efficient vehicles to consumers.

DOT is [required by law to set “maximum feasible” CAFE standards](#), and it is incumbent on the Department to take a close look at available technology that can improve the efficiency of gas-powered vehicles. There continue to be numerous cost-effective fuel efficiency technologies that are not deployed on most gas-powered vehicles sold in the U.S. Perhaps the most important one for saving consumers money on fuel is hybrid technology. [CR research has shown](#) that existing hybrids on the market can deliver \$5 in fuel savings for every \$1 increase in vehicle price, and CR testing has shown that modern hybrids deliver large fuel savings without sacrificing affordability, reliability, or performance.

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<sup>3</sup> Consumer Reports, nationally representative American Experiences Survey of 2,130 U.S. adults (Dec. 2024) (online at: [article.images.consumerreports.org/image/upload/v1736806650/prod/content/dam/surveys/Consumer\\_Reports\\_AES\\_December\\_2024.pdf](https://article.images.consumerreports.org/image/upload/v1736806650/prod/content/dam/surveys/Consumer_Reports_AES_December_2024.pdf)).

<sup>4</sup> Consumer Reports, nationally representative Fuel Economy Survey 2024 of 2,191 U.S. adults (Aug.-Sept. 2024) (online at: [article.images.consumerreports.org/image/upload/v1730394977/prod/content/dam/surveys/Consumer\\_Reports\\_Fuel\\_Economy\\_August\\_September\\_2024.pdf](https://article.images.consumerreports.org/image/upload/v1730394977/prod/content/dam/surveys/Consumer_Reports_Fuel_Economy_August_September_2024.pdf)).

<sup>5</sup> *Id.*

Overall, [CR finds that today's CAFE standards](#) are already at the weaker end of what is achievable with current technology. We support maintaining and strengthening these standards into the future.

DOT also has an important role to play in the buildout of EV charging nationwide, to continue to deliver a world-leading transportation system for the American people. While the [private sector will continue to be the primary driver](#), the federal government has an important role to play in filling gaps and ensuring all Americans have access to charging, not just Americans who live in places where it is the most profitable to build chargers. This is especially important for rural Americans, [who spend 75% more of their income on fuel](#) than the average non-rural driver, but for whom the private sector has been the slowest to provide charging infrastructure without government investment.

In summary, the next several years will be pivotal in shaping the safety and sustainability of our transportation system and the vehicles available to consumers. As technology advances, it is important for the Department to maintain a robust, expert workforce to stand up for consumers, save them money, and help them stay safe on our roads. DOT has the chance to close safety gaps and ensure that technological advances translate into real-world benefits for consumers – and it must not pass up this opportunity. CR looks forward to continued engagement in these efforts and working together to ensure that transportation policy serves consumers.

Sincerely,

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