

Why Susan Dudley is Dangerous for Public Safety



Susan Dudley, nominee for administrator of the Office of Information and Regulatory Affairs, has consistently opposed protections of the public health, safety, and environment. Here is a look at Dudley in her own words.

Air Bags: Maximizing Safety Benefits for all Vehicle Occupants and Minimizing Injuries

| Why It Matters | What She Said |
|---|--|
| <p><i>Air bags have reduced the risk of death in frontal collisions by 30%, and have saved over 14,000 lives.</i></p> <p><i>When the first requirements for air bags went into effect, some automakers used cut-rate technology and shoddily designed air bags, which posed safety risks to infants, children, and small-statured adults. Better technology was available, but the manufacturers chose not to use it.</i></p> <p><i>After the auto industry failed to voluntarily improve the safety design of air bags, Congress ordered the National Highway Traffic Safety Administration to mandate safety improvements. In 1998, NHTSA proposed upgraded performance requirements for air bags that would reduce air-bag related risks to all vehicle occupants.</i>¹</p> | <p>“NHTSA does not propose to require all vehicles to be equally comfortable or attractive to all consumers, yet through this very complex rulemaking, it attempts to make all vehicles equally safe for occupants with widely different sizes, preferences, and behaviors.”²</p> <p>“[R]egardless of how sophisticated NHTSA makes its tests, or how sophisticated manufacturers make air bags, this one-size-fits-all approach will not meet the preferences or protect the safety of all consumers under all conditions.”³</p> <p>“NHTSA estimates that air bags have reduced fatalities in frontal crashes by about 30 percent. Moreover, judging from vehicle manufacturers’ pre-regulation actions and ongoing advertising, which lists dual air bags as a positive attribute in new vehicles, consumers appear to prefer vehicles equipped with air bags. These facts, however, are not sufficient to justify federal regulation requiring air bags. If air bags protect lives, and consumers demand them, it is reasonable to assume that automobile manufacturers would have installed air bags in the absence of federal requirements to do so.”⁴</p> |

Making Roads Safer by Reducing Fatigue-Related Truck Crashes

| Why It Matters | What She Said |
|---|---|
| <p><i>Almost 5,000 people are killed each year in truck-related crashes, many of which are directly linked to sleep deprivation and fatigue. Under standards that had not been updated in decades, trucking companies could force their drivers to work up to 70 hours in an eight-day period.</i></p> <p><i>The Federal Motor Carrier Safety Administration issued a notice of proposed rulemaking in 2000 to reduce the incidence of fatigued drivers.</i></p> | <p>“The real reduction of accidents involving trucks, and other vehicles as well, is clearly a desirable aim. Restrictions on hours and driver flexibility as proposed in all five options will not, however, achieve those goals. The proposed work hour caps cannot effectively mandate reductions in sleep debt, and DOT’s proposal to eliminate alternatives and flexibility in a system with as large and diverse a work force as trucking will not address the sleep deficit problem, if indeed one exists.”⁵</p> |

¹ “Federal Motor Vehicle Safety Standards; Occupant Crash Protection.” Federal Register 63 (18 September 1998): 49958.

² Dudley, Susan. *Comments to “Federal Motor Vehicle Safety Standards; Occupant Crash Protection,”* Mercatus Center p. 7.

³ Dudley, Susan. *Advanced Air Bags Regulatory Studies Program Comments Executive Summary*. Mercatus Center: Dec. 17, 1998, p. 1.

⁴ Dudley, Susan. *Advanced Air Bags Regulatory Studies Program Comments Executive Summary*. Mercatus Center: Dec. 17, 1998, p. 7.

⁵ Susan Dudley, Brian Mannix & Jennifer Zambone, Comment on the Office of Management and Budget’s Draft Report to Congress on the Costs and Benefits of Federal Regulation, May 28, 2002, at A-26.