

Mr. Chris Hardej  
New York Metropolitan Transportation Council  
199 Water Street, 22<sup>nd</sup> Floor,  
New York, NY 10004

April 2, 2007

Dear Mr Harjed

We are grateful that NYMTC has undertaken this much needed study and gives us the opportunity to comment on the stuffy. CHEKPEDS applauds the excellent suggestions the study makes. The study is thorough and a solid foundation to build upon and a major step forward.

By following your recommendations, pedestrians will be fully educated on how to avoid cars and accidents. However, educating only the victims will not be enough to win this battle. Here are some suggestions:

**Driver's education:** In the current test, the questions related to pedestrians are few and far between. Have each chapter of the manual address pedestrians. In the penalties section, more questions are needed relating to penalties for pedestrian injuries and deaths. The driver's license examination must include new questions for both new drivers and those renewing their permits: as part of the test, there should be a minimum of five questions related to the responsibilities of the drivers vis-à-vis pedestrians.

**Complete statistics:** The statistics show that in 67.5% of the crashes in New York City, there were no "contributing factors by the pedestrians", which generally means no fault by pedestrians. There are no comparable statistics of whether there were "contributing factors by drivers". It is imperative that such information be collected and data analyzed to improve driver education and make changes to the traffic laws.

In order to do so, the "contributing factor report" that is filled by the police after a crash occurs, must be redesigned. Currently the top four questions deal with actions by pedestrians (who are deceased and therefore the information is provided by the driver). Only question 23 starts to deal tangentially with drivers' behavior. The report needs to be rebalanced so that the first ten questions cover both driver and pedestrian. The police must change their thinking, to consider pedestrians as victims.

**Community Input:** Engineers who are themselves drivers design all decisions related to pedestrian safety at locations they are not familiar with. It is regrettable that the extensive community knowledge accumulated through thousands of observations is not taken in account to make these decisions.

It should be mandatory that field surveys performed by DOT and elected officials after a crash include community members.

**Penalties:** On the legislative side, why not start with the concept that a driver is "In control of his vehicle", especially in the city where speeds cannot exceed 30 mph- and therefore is responsible for his actions. The current penalties for failure-to-yield are woefully inadequate.

Highly advertised jail terms would 'wake drivers up' – as would publicizing the strict revocation of the privilege to drive for two years.

**Hot spots:** Statistics on specific road conditions on the most dangerous corridors would be very useful:

- Is there a correlation between traffic congestion and pedestrian safety?
- Is there a correlation between two-way streets with left turns and pedestrian safety?
- Is there an increase in pedestrian injuries or deaths in neighborhoods where highways convert into city grids (tunnel, bridge etc) where drivers need time to adjust to the change in conditions? NYMTC statistics **have demonstrated** that traffic volume increased at crossings into New York City that connect to street grids, while volume decreased where highways connect to highways. The presence of tolls in the latter generally explains the latter

**Traffic Safety Board** - New York City has the highest proportion of pedestrian casualties per crash, but still New York City counties (except Queens) do not have a Traffic Safety Board. Currently, the traffic safety education officer reports to the NYCDOT Commissioner and this structure does not afford the visibility and the autonomy required for the pedestrian safety mission, which is political rather than technical by nature. Such boards are sorely needed to address the unique circumstances of each county and raise awareness at all levels of agencies and government. A coordinator is not enough; rather the pedestrian safety equivalent of the Surgeon General is required

Thank you for the opportunity to share our comments. We look forward to continuing to work with you on this **vital** topic.

Sincerely,

Christine Berthet, Co-Founder  
CHEKPEDS  
Phone: 646 623 2689 - Fax: 212 504 8387  
Email [Excom@chekped.com](mailto:Excom@chekped.com)