



May 17, 2019

Office of Management and Budget  
Attention: NHTSA Desk Officer  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Re: Docket Number NHTSA-2018-0094

Dear Desk Officer:

Thank you for allowing the National Safety Council (NSC) the opportunity to comment on this Information Collection Request to extend the Fatality Analysis Reporting System ("FARS").

NSC is a nonprofit organization with the mission of eliminating preventable deaths at work, in homes and communities, and on the road through leadership, research, education and advocacy. Our more than 15,000 member companies represent employees at more than 50,000 U.S. worksites.

Today, unintentional injuries are the third-leading cause of death in the United States, with 161,374 people dying from preventable injuries in 2016 alone.<sup>1</sup> Motor vehicle crashes are the leading cause of unintentional death for people from 3 to 24 years of age and a leading killer in all age groups.<sup>2</sup> If we are to eliminate preventable deaths in our lifetime, we must realize massive, near-term gains in highway safety, and these efforts are only as good as the data underlying them.

FARS was created by the National Highway Traffic Safety Administration (NHTSA) in 1975 to provide an overall measure of highway safety, to suggest solutions, and to provide an objective basis in evaluating the effectiveness of motor vehicle safety standards and highway safety programs.<sup>3</sup> FARS is the sole source for nationwide standardized, state-documented information on police-reported traffic crashes with at least one fatality, providing an annual collection of over 30,000 fatal crash cases from all 50 States, the District of Columbia and Puerto Rico. The data collected are vital for NHTSA, other Federal agencies, Congress, States, researchers, law enforcement, and the general public in identifying causes, trends and effective countermeasures of crashes. The data states collect can also help identify trends in motor vehicles crashes.

NSC encourages NHTSA to support states in data collection and moving toward electronic systems that can update data on a more real-time basis to allow for better analysis. Some states make their crash data available online and provide key tools for public evaluation. NSC encourages NHTSA to share best practices from leading states that are building collaborative relationships between all stakeholders. If we are to reach zero fatalities, accurate data are critical to achieving our goal, and FARS can play a central role.

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<sup>1</sup> National Safety Council, *Injury Facts*

<sup>2</sup> National Safety Council, *Injury Facts*

<sup>3</sup> Koehler, Stephen A. & Brown, Peggy A. *Forensic Epidemiology*.



Finally, NSC encourages NHTSA to determine whether additional relevant crash data could be collected in the system, particularly around vehicles being outfitted with ADAS systems. Data around ADAS equipped vehicles that are involved in police-reported crashes with at least one fatality would be especially informative.

We urge you to approve this Information Collection Request, extend the Fatality Analysis Reporting System, aid states in modernizing their data collection systems and consider extending data collection to include information about ADAS systems. Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink that reads "Nick Smith".

Nick Smith  
Interim President & CEO