



# Commercial Vehicle Safety Alliance

Improving uniformity in commercial motor vehicle safety and enforcement

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May 28, 2019

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

**RE: Docket Number: NHTSA-2018-0094**  
***Agency Information Collection Activities; Fatality Analysis Reporting System***

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments regarding the National Highway Traffic Safety Administration's (NHTSA) notice and request for comments on the Fatality Analysis Reporting System (FARS), docket number NHTSA-2018-0094.

CVSA is a nonprofit association comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to achieve uniformity, compatibility and reciprocity of commercial motor vehicle inspections and enforcement by certified inspectors dedicated to driver and vehicle safety. Our mission is to improve commercial motor vehicle safety and uniformity throughout Canada, Mexico and the United States, by providing guidance and education to enforcement, industry and policy makers.

CVSA commends and thanks NHTSA for seeking to enhance the quality, utility and clarity of the information collected through FARS while also seeking ways to minimize the burden on the states submitting data to FARS.

NHTSA invited comments on (a) whether the proposed collection of information is necessary for the department's performance; (b) the accuracy of the estimated burden; (c) ways for the department to enhance the quality, utility and clarity of the information collection; and (d) ways the burden could be minimized without reducing the quality of the collected information.

Responding to (a), (b) and (d) first, the agency's collection of information is critical both for the department's performance and as a resource for the states. A holistic view of crash data will assist in the reduction of crashes, including those involving commercial motor vehicles. NHTSA's updated estimated total annual burden to the states was corrected to 106,224 hours, which now accounts for hours spent by supervisors responding to FARS, as well as manual data entry into FARS. This is a significant burden to the states. CVSA's response to Docket Number DOT-NHTSA-2018-0034 supported the creation of a national database of crash data consolidating, through electronic transfer, the data collected by states. The transition from manual entry of data to electronic transfer is critical to reduce the burden on the states. This transition will not reduce the quality of the information, rather the information will be enhanced by eliminating manual data entry errors. Additionally, electronic transfer will facilitate crash data availability in a timelier manner, allowing involved parties to make safety decisions with the most up to date information possible.

While CVSA is supportive of NHTSA's efforts to create a timelier collection of national crash data, we have concerns about the cost to states and the availability of data. NHTSA's estimated 200 hours and total cost of \$8,800 per states from Docket DOT-NHTSA-2018-0034 does not sufficiently account for the burden on each state. Many states will have to undergo significant information technology (IT) systems changes to deliver the electronic data in the necessary format. These costs should be offset with the availability of federal funding so that states have the necessary resources to make needed IT changes. Additionally, the data that is collected at the federal level should be made available to more than just the U.S. Department of Transportation and other federal agencies. The collected data should be made available to states, academia, organizations and other interested parties that can utilize the data to help improve highway safety.

Responding to (c), ways for the department to enhance quality, utility and clarity of information collection, CVSA encourages the adoption of the Model Minimum Uniform Crash Criteria (MMUCC). The MMUCC provides a standardized data set for describing vehicle crashes. Additionally, Data from the Federal Motor Carrier Safety Administration, FARS, Governors Highway Safety Association, NHTSA and the Center for Disease Control all point to a larger number of drug impaired drivers involved in fatality crashes on our highways. To better capture the impact of drugged driving, NHTSA should capture the seven Drug Recognition Categories utilized by Drug Recognition Experts (DREs). Currently, many states only capture whether drugs were present or "contributed" to a crash, while alcohol allows for the collection of a breath or blood alcohol content. Inclusion of the DRE categories will allow end users to determine where to strategically utilize enforcement and impairment models to reduce crashes based on drug usage, time of day, GEO location, age and all other demographics. By further standardizing crash data collected, a more useful and robust data sample can be accumulated at the federal level. The increased attention to uniform and effective crash data will continue to make our roadways safer by providing useful data to inform enforcement and safety program efforts.

CVSA works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the opportunity to comment on this proposal and the agency's commitment to safety and stakeholder involvement.

If you have further questions or comments, please do not hesitate to contact me by phone at 301-830-6149 or by email at [collinm@cvsa.org](mailto:collinm@cvsa.org).

Respectfully,



Collin B. Mooney, MPA, CAE  
Executive Director  
Commercial Vehicle Safety Alliance

Attachment:



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September 10, 2018

Docket Services  
U.S. Department of Transportation  
1200 New Jersey Ave., SE  
West Building, Ground Floor  
Room W12-140  
Washington, DC 20590-0001

**RE: Docket Number: DOT-NHTSA-2018-0034**  
***State Data Transfer for Vehicle Crash Data***

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments regarding the National Highway Traffic Safety Administration's (NHTSA's) notice of intent to submit an information collection request (ICR) on the state data transfer for vehicle crash information, docket number DOT-NHTSA-2018-0034.

CVSA is a nonprofit association comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to achieve uniformity, compatibility and reciprocity of commercial motor vehicle inspections and enforcement by certified inspectors dedicated to driver and vehicle safety. Our mission is to improve commercial motor vehicle safety and uniformity throughout Canada, Mexico and the United States, by providing guidance and education to enforcement, industry and policy makers.

CVSA supports NHTSA's efforts to create a national database of crash data that consolidates, through electronic transfer, the data collected by states. Access to a holistic view of crash data will assist in the reduction of crashes, including those involving commercial motor vehicles. The transition from manual entry of data to electronic transfer will facilitate crash data availability in a timelier manner, allowing involved parties to make safety decisions with the most up to date information possible. The more accurate data provided will help better inform the enforcement community on where available resources can make the largest impact and save the most lives.

The increased attention to uniform and effective crash data will continue to make our roadways safer. As NHTSA, states and other partners continue to develop crash data standards, CVSA encourages the adoption of the Model Minimum Uniform Crash Criteria (MMUCC). The MMUCC provides a standardized data set for describing vehicle crashes. By further standardizing crash data collected, a more useful and robust data sample can be accumulated at the federal level.

While CVSA is supportive of NHTSA's efforts to create a timelier collection of national crash data, we have concerns about the cost to states and the availability of data. The estimated 200 hours and total cost of \$8,800 per states does not sufficiently account for the burden on each state. Many states will have to undergo significant information technology (IT) systems changes to deliver the electronic data in the necessary format. These costs should be offset with the availability of federal funding so that states can have the necessary resources to make needed IT changes. Additionally, the data that is collected at the federal level should be made available to more than just the U.S. Department of Transportation and other federal agencies. The collected data should be made available to states, academia, organizations and other interested parties that can utilize the data to help improve highway safety.

The Alliance works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions.

If you have further questions or comments, please do not hesitate to contact me by phone at 301-830-6149 or by email at [collinm@cvsa.org](mailto:collinm@cvsa.org).

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