



GENERAL MOTORS LLC
Global Vehicle Safety

USG 4943
June 22, 2020

Ms. Julie Vallese
Associate Administrator
Office of Communications and Consumer Information
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: NHTSA Agency Information Collection Activities, Notice and Request for Comment, Government 5-Star Safety Ratings Label Consumer Research, Docket No. NHTSA-2020-0006 (the "Notice")

Associate Administrator Vallese,

General Motors, LLC (GM) is responding to the Notice. The Notice was published on April 28, 2020 and is seeking comment on issues related to a proposed collection of information per procedures established under the Paperwork Reduction Act of 1995 that require the Agency to request public comment prior to seeking approval for the collection of information from the Office of Management and Budget.

Since its inception in the 1970's, the New Car Assessment Program (NCAP) has become a useful tool for automotive consumers in the United States to assess the safety performance and crash avoidance features associated with motor vehicles.

GM has a long history of automotive safety innovation based upon research and relevant field data and believe it is important to convey vehicle safety information to the consumer in a concise and easily understandable format. We support the Agency's effort to improve the NCAP 5-Star Safety Ratings Label by incorporating crash avoidance information and are pleased to submit the following comments.

The Notice discussed the general methodology of the proposed research but did not discuss the specific content or how the content will be presented to participants (otherwise known as stimuli). It states that NHTSA will test concepts but does not specify the number or format of the concepts. It did not provide specifics about how the label itself will change to incorporate new information or what new information regarding crash avoidance will be conveyed. High level objectives are provided but specific topics for discussion (usually conveyed in a moderator guide) are not included. Lacking more complete information it is difficult to comment in a comprehensive manner. However, based on what is contained in the Notice, the described research is a reasonable first step to obtaining consumer feedback on label changes.



The following comments are respectfully offered as considerations that could improve output, efficiency, and reduce burden during the study:

- **Quantitative Study**

While not mentioned in the proposal, we believe it is important that this qualitative study be followed with a quantitative study to objectively measure comprehension, distinctiveness, preference, strengths and weaknesses.

- **Participant Qualifications**

The proposal does not mention the qualifications to participate. We believe participants should be drawn from the population of households that acquired a new vehicle, not used, as the window label is more relevant to new vehicle buyers than used vehicle buyers. Depending on the sample frame, the stated 20% incidence of completion may not account for screening new vehicle, not used vehicle buyers.

- **Reduce number of participants from 9 to 6 per group while keeping the time allocated constant.**

Advantages could include: 50% more average time allocated per respondent (15 minutes vs. 10 minutes); 30% reduction in time allocated to participant introductions; and an opportunity for better engagement of participants, given that there could be less opportunity for some participants to "hang back" in the discussion.

- **Reduce the number of cities from 4 to 3, or perhaps 2.**

Conducting just two groups per day and spreading over 4 cities may be unnecessary to obtain the desired feedback. The following options could increase efficiency:

Option 1 - Conduct 3 groups per city per day—3 cities. (9 groups total). Allocate some of the resource savings from reducing the number of participants per group to add a 9th group. Three groups per city provides the opportunity for a 'tie-breaker' within the same market/conditions.

Option 2 - Conduct 4 groups per city per day—2 cities (8 groups in total). We believe eight groups are more than enough to explore the topic and reach convergence on the range of opinions; there may be limited value to the 9th group in Option 1. Further, conducting four groups at the same facility per day would allow the time slots of the groups to be spread out, allowing inclusion of participants with different work schedules.

- **Incorporate Iterative Design**

GM recommends an iterative design for the study as we have found better outcomes related to comprehension when using an iterative design approach.

Iteration includes modifying the original stimuli (label concept illustrations) in response to initial customer input and then testing the revised stimuli to confirm that changes improved the concepts. In all iterative design projects, the actual designers of the

concepts need to observe the customer reactions to the designs. The following options provide iterative approaches:

Option 1- Iterate between cities. Allow time in between cities to modify the stimuli for the next round.

Option 2 - Re-frame the project as a usability study. Conduct 4 to 6 one-on-one usability interviews (45-60 minutes/interview) in one day. After the day's sessions, modify the stimuli. Then conduct another set of 4 to 6 one-on-one interviews with the revised stimuli. Continue the iteration steps until convergence on one or two strong alternatives is achieved. The finalist designs could then be confirmed using a quantitative study.

The advantages of this approach are that designers see, hear and respond to customer input and confirm their response to the input. This approach also allows comprehension to be measured objectively—a potential shortcoming of the focus-group approach.

If you have any questions, or need additional information, please contact Matthew Jerinsky from our Washington, DC office, or me.

Sincerely,

John Capp
Director,
Global Safety Technology & Strategy