



January 18, 2022

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National Highway Traffic Safety Administration (NHTSA)
Docket Management Facility (M-30)
U.S. Department of Transportation
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue S.E.
Washington, DC 20590

Re: Agency Information Collection Activities; Notice and
Request for Comment; Government 5-Star Safety Ratings
Label Consumer Research; Doc. No. NHTSA-2021-0033.

Ladies and Gentlemen:

The National Automobile Dealers Association (NADA) represents over 16,000 franchised automobile and truck dealerships that sell new and used motor vehicles and engage in service, repair, and parts sales. Together they employ more than 1,100,000 people nationwide, yet most are small businesses as defined by the Small Business Administration.

NHTSA seeks comment on a request for approval from the Office of Management and Budget for a new information collection request (ICR).¹ NHTSA intends to conduct research via “focus groups in four geographic markets located across the country to evaluate design and consumer information improvements to the Government 5-Star Safety Ratings section of the Maroney label.”² NHTSA states that it will “use the findings from this research to support planned changes to the current label requirements and future designs for communicating vehicle safety ratings and advanced driver assistance systems performance assessments to consumers.”³ NHTSA previously sought comment on April 28, 2020 and received four comments in response.⁴

NADA agrees with the suggestion of previous commentors that, rather than imposing the burden and cost on the public for two separate ICRs, NHTSA should defer conducting research on the effectiveness of potential new Maroney label information until such time as it makes preliminary decisions regarding potential label changes. The ICR does not specify what information NHTSA intends to present to the focus groups. Given that Monroneys label information is vehicle specific, NADA urges NHTSA to outline what specific changes it will

¹ 86 Fed. Reg. 64989, *et seq.* (Nov. 19, 2021).

² 86 Fed. Reg. at 64990.

³ *Id.*

⁴ 86 Fed. Reg. at 64989.

present to the focus groups. NADA and its members—new motor vehicle dealers experienced with selling new vehicles with Maroney labels—look forward to evaluating that information and to providing input designed to make the focus group process more useful and productive.

NADA also urges NHTSA to pre-screen potential participants in a manner designed to ensure that they are prospective purchasers of new motor vehicles rather than members of the public selected randomly. Since Monroney label information is exclusively used by prospective new motor vehicle purchasers to make useful comparisons between vehicle make/models, the more that can be done to ensure that the focus groups are composed of prospective new vehicle purchasers, the better situated those groups will be to evaluate what NHTSA presents during its focus group sessions and to provide the agency with helpful responses.

On behalf of NADA, I thank NHTSA for the opportunity to comment on this matter.

Respectfully submitted,

A handwritten signature in black ink, reading "Douglas I. Greenhaus". The signature is written in a cursive style with a large, stylized 'D' and 'G'.

Douglas I. Greenhaus
V.P., Regulatory Affairs,
Environment, Health and Safety