



January 18, 2022

Ms. Juliette Marie Vallese
Associate Administrator, Office of Communications and Consumer Information
National Highway Traffic Safety Administration
1200 New Jersey Ave, SE
Washington, D.C., 20590

RE: Agency Information Collection Activities; Notice and Request for Comment; Government 5-Star Safety Ratings Label Consumer Research [Docket Number: NHTSA-2021-0033]

Dear Ms. Vallese,

The Alliance for Automotive Innovation (“Auto Innovators”) appreciates the opportunity to provide comments in response to the National Highway Traffic Safety Administration’s (“NHTSA”) notice and request for public comment on the approval of a new collection of information to conduct qualitative research to evaluate design and consumer information improvements to the Government 5-Star Safety Ratings section of the Monroney label.

Auto Innovators is the singular, authoritative, and respected voice of the automotive industry, representing motor vehicle manufacturers responsible for nearly 99 percent of cars and light trucks sold in the U.S., original equipment suppliers, technology companies, and others within the automotive ecosystem. Accounting for roughly one-fifth of annual automotive R&D investment globally, the U.S. continues to lead in bringing the next generation of breakthrough automotive and mobility technologies to the market. Some of these technologies – including connectivity, electrification, and automation – have incredible potential to improve vehicle safety, reduce emissions, increase transportation equity, and grow the U.S. economy. Auto Innovators and its members are committed to a cleaner, safer, and smarter transportation future.

In general, Auto Innovators is supportive of NHTSA’s ongoing efforts to modernize the New Car Assessment Program (NCAP). An effective and consistently maintained NCAP can help increase consumer awareness of vehicle safety features and leverage market forces to accelerate the development and deployment of advanced safety technologies and performance. We encourage NHTSA to prioritize this information collection effort to ensure that it is completed in a timely manner and avoids any further delays in updating NCAP.

In April 2021, Auto Innovators provided several recommendations to NHTSA for modernizing the NCAP titled, *21st Century NCAP: Plan to Advance Safety at the Speed of Innovation*.¹ These recommendations included: (1) the need for establishing clear roadmaps for enhancing the program, (2) ensuring regular stakeholder engagement, (3) maintaining a process for consistent and harmonized program updates, (4) prioritizing rulemaking to support deployment of advanced technology, and (5) periodic reviews and evaluation of the program’s effectiveness. The proposed information collection for which the agency is

¹ <https://www.autosinnovate.org/about/advocacy/NCAP%20PDF%204-19-21.pdf>

seeking approval is consistent with this final recommendation, and we are encouraged that NHTSA is taking action to better understand preferences on the effectiveness of various label concepts.

At present, the 5-Star Safety Ratings section on the Monroney Label is primarily used to communicate information on how well a vehicle performs in various NCAP test scenarios. This includes star ratings for the driver and right front passenger in a frontal crash, star ratings for the front and rear seat passenger in a side crash, and a star rating based on vehicle rollover. Consumers can then use this information to compare and contrast the safety performance of vehicles within a given model year.

As NHTSA considers updates to the program, it is essential that the agency conduct research to better understand how consumers access relevant vehicle safety information. Understanding consumer perspectives on the expected changes to the program will inform how best to structure the format and content of the label, and help identify the most effective methods for communicating any new safety information that may be included in the future.

Auto Innovators generally supports the proposed collection of information as it is both necessary for the proper performance of the functions of the agency in ensuring a modernized approach to NCAP, and because the information can have practical utility in informing the structure and content of the Monroney label information. However, as outlined in the sections that follow, we have provided a series of recommendations for the agency to consider as it finalizes the structure and content of the focus groups planned as part of this effort. These comments focus primarily on ways to enhance the quality, utility, and clarity of the information to be collected.

1. Recommendations to enhance the quality, utility, and clarity of the information to be collected

Auto Innovators members support NHTSA's ongoing efforts to update NCAP to include information on crash avoidance technology available on modern vehicles (per the requirements of the Fixing America's Surface Transportation (FAST) Act). The Monroney label provides an important point of reference for consumers when comparing vehicles at the point of sale. However, since the safety portion of the label was last updated, there have been several changes in the ways consumer access information to help inform their purchasing decisions. Furthermore, the information that consumers find to be most useful and relevant may vary from individual to individual.

As the agency considers updates to NCAP, it is reasonable to assume that the program will add a number of new ratings criteria that could potentially be included on the Monroney label. Prioritizing which information is on the label, while also ensuring consumers have access to a more complete vehicle safety profile for a particular make and model, becomes increasingly important – particularly given the potential limitations on the size of the label (*which is required to be affixed to the vehicle window*), and the size of the safety portion (*which, by regulation, must be positioned alongside other relevant vehicle information – e.g. fuel economy*). Using the existing label design as a baseline for comparison can help identify which potential elements are most valuable to consumers, and inform what potential changes might be possible as part of any future design changes and the extent to which these updates can be accommodated based on the existing footprint.

As part of an industry effort to provide constructive feedback to the agency for enhancing NCAP, in June 2021, Auto Innovators conducted a consumer survey (“AFAI Survey”²) to help better understand: (1) consumer attitudes on the importance of safety when purchasing a new vehicle; (2) the sources of information that consumers are utilizing; (3) opportunities for building upon the current rating structure; (4) the resources consumers find most valuable for making an informed safety decision, and; (5) consumer perspectives on future Monroney label considerations. The findings from this survey provide the basis for the recommendations:

i. Consumer attitudes on the importance of safety

Based on the AFAI survey, most consumers were at least somewhat familiar with one or more crash avoidance technologies, with the strong majority of respondents (86%) indicating that it was important that their next vehicle be equipped with crash avoidance technology.³ The survey also found that most respondents believed safety ratings were important when considering their next vehicle. We encourage NHTSA to explore whether focus group participants have similar attitudes, and whether there are opportunities for NCAP to increase consumer awareness and demand for safer vehicles through the effective presentation of relevant safety information on the Monroney Label.

ii. Sources of Information that consumers utilize to access vehicle safety information

The AFAI survey found that the sources that consumers use to research vehicle safety information varies, with a large percentage of respondents having not used the NHTSA.gov website or app to check a vehicle safety rating (74%). However, one of the interesting findings from the survey was the difference in likelihood that a consumer would use the “NHTSA NCAP 5 Star rating” program for safety information versus using the “vehicle window sticker,” which was ranked comparatively higher.⁴

Despite these sources essentially being one and the same, the findings point to a potential disconnect between consumers’ awareness of NCAP and its connection to the Monroney label. While the AFAI survey did not explore this finding in more detail, we encourage the agency to investigate whether there are opportunities to leverage the Monroney label to drive greater awareness of the NCAP program, generally. We also encourage NHTSA to assess new approaches to promote the program to maximize its overall value for consumers as point of reference for consumers.

iii. Opportunities to build on the current ratings structure

Auto Innovators is supportive of the agency’s stated goals for a focus group effort as discussed at page 25241 of the Federal Register notice.⁵ The Monroney label should provide a clear, accurate, and straightforward snapshot of the safety features available on a particular vehicle. Based on AFAI survey results, almost all of the respondents surveyed (92%) indicated that the five-star rating was easy to understand and that it allowed ratings to be easily compared between vehicles (with most correctly

² For reference, a summary of the AFAI survey questions and results are attached in the appendix section.

³ 89% of consumers were “very familiar” or “somewhat familiar” with lane departure warning systems (highest ranked out of 10 technologies in terms of consumer familiarity). 50% of consumers were “very familiar” or “somewhat familiar” with rear automatic braking systems (lowest ranked in terms of familiarity).

⁴ 50% of consumers indicated they were “very likely to use” the “window sticker” versus 31% that were likely to use the “NHTSA NCAP 5 Star rating.”

⁵ <https://www.federalregister.gov/d/2021-25241/p-28>

identifying a higher rated vehicle when presented with two different labels). In addition, there was a strong preference (80%) for the agency to continue use of the NCAP 5-Star Rating System over a hypothetical *Medal System* (which was previously proposed by NHTSA in prior agency requests for comment on NCAP).

The majority of respondents in the AFAI survey also appeared to prefer the current US NCAP star rating format (66%) when compared to the Euro NCAP approach (15%), which assigns a percentage score based on how well a vehicle performs in various safety categories. We urge NHTSA to explore whether the focus group respondents provide similar feedback on the preferred ratings format for presenting new safety information, but also to consider some of the opportunity costs in deviating from the current star rating format. For example, if the agency were to shift to a medal-based format for communicating crash avoidance information, there is a need to understand whether consumers could easily interpret information presented in different formats on the same label (without the need for extensive explanatory text), and whether the chosen format is perceived to provide a fair representation of the vehicle safety performance in a way that can be easily compared and contrasted with similar vehicles for a given model year. In addition, there is also a need to consider whether medal information could be effectively communicated both in the presence or absence of color given that there may be accessibility issues in terms of colorblindness, notwithstanding the added complexity in adding colors to the label as part of the printing process.

The structure and format for how information is presented can help contribute to the success of the program and incentivize greater manufacturer engagement. Most respondents in the survey (81%) indicated that it was important that vehicles include an overall rating that combines both the crashworthiness rating and the crash avoidance technology rating. In addition, the results of the survey appeared to suggest that the assessment criteria should be structured to allow for differentiation between various levels of performance. A strong majority of respondents (84%) indicated that half stars would be helpful with few indicating they would be unhelpful. It is important that efforts to differentiate levels of vehicle safety performance can be supported by real-world crash data and that information on the methodology for determining a vehicle score can be easily accessed by consumers. Again, we urge the agency explore this issue further as part of its focus group engagement.

iv. Resources that consumers find most valuable

While we recognize that the focus of this effort is to evaluate various label concepts, it is important that the label design be considered in the context of the overall safety information that is made available to consumers through NCAP. The vast majority of respondents in the AFAI survey (84%) indicated that it was important to have access to more detailed information on how safety tests are used to determine the overall rating. This can help further educate consumers on available safety features rated as part of the program, and also provide a resource for understanding the capabilities and limitations of certain systems.

More than two-thirds of respondents (70%) indicated that it would be helpful to include a QR code on the window sticker to provide access to more detailed safety information. While most respondents had access to a smartphone that could be used to access additional resources at the point of sale, just under two-thirds of respondents had used a QR code (63%).

Since Monroney label space is limited, the inclusion of a QR code may require tradeoffs in terms of moving, resizing, or removing certain existing elements. However, the added benefits are that it could provide a means for consumers to access detailed information more readily on a particular vehicle make and model (depending upon how the process is implemented). We recommend that NHTSA explore whether focus group participants have similar perspectives on the use of QR codes in combination with, or as alternative to listing the NHTSA.gov website on the Monroney label. NHTSA should also consider efforts to improve the legibility and accessibility of information on the NCAP website for viewing on smartphones and other portable devices.

2. Minimizing the burden of the collection of information

We have no comments on minimizing the burden of this information collection effort, but note that there are downstream burden considerations that should be taken into account when proposing various label designs (or design elements) for the focus group to review. While understanding consumer preferences on the content of the label is a necessary part of the process, it is also important to ensure that the research drives toward practical and feasible solutions that enhance the program and ensure consumers have access to relevant safety information, both at the point of sale, as well as other resources (e.g. NHTSA.gov website). We therefore encourage the agency to avoid overly complex design concepts that could present unreasonable challenges in terms of label production.

--

As noted in Auto Innovators 21st Century NCAP recommendations, we are supportive of updating the program to include crash avoidance ratings for technologies that have shown real-world safety benefits. We encourage NHTSA to prioritize this information collection effort to ensure that it is completed in a timely manner and avoids any further delays in updating NCAP. We are hopeful that the agency can leverage the high-level findings from the AFAl survey as an initial point of reference for comparing and contrasting consumer perspectives on key elements related to the design of the Monroney label, and we look forward to working with the agency in providing feedback on this important issue. Finally, we request that the findings from this research effort be made available as soon as possible to ensure that stakeholders have the opportunity to provide comment on the potential design options being considered.

Appendix - Auto Innovators Consumer Survey



1



2

Introduction

Auto Innovators worked with our members to develop and conduct a survey to help identify consumer perspectives on vehicle safety ratings and support the development of recommendations for future improvements to NCAP.



3

AFAI 21st Century NCAP Recommendations [April 2021]

Our vision for 21st Century NCAP includes **five recommendations** to ensure that NCAP achieves its main objectives of providing meaningful information for consumers, accelerating the deployment of safety technologies, and supporting future regulatory activity.

1. Establish Mid- to Long-Range NCAP Opportunity Roadmaps
2. Annual Stakeholder Engagement
3. Consistent and Harmonized Program Updates
- 4. Program Review & Evaluation**
5. Prioritize Rulemaking to Remove Existing Regulatory Barriers



4

Consumer Survey - Overview

- Survey Dates:
 - June 22-28, 2021
- General background on survey respondents
 - Prospective new car buyers (considering purchase in near-to-mid term)
- Total survey responses
 - n=2776 (all segments)
- Median Length:
 - 9 minutes and 49 second



5

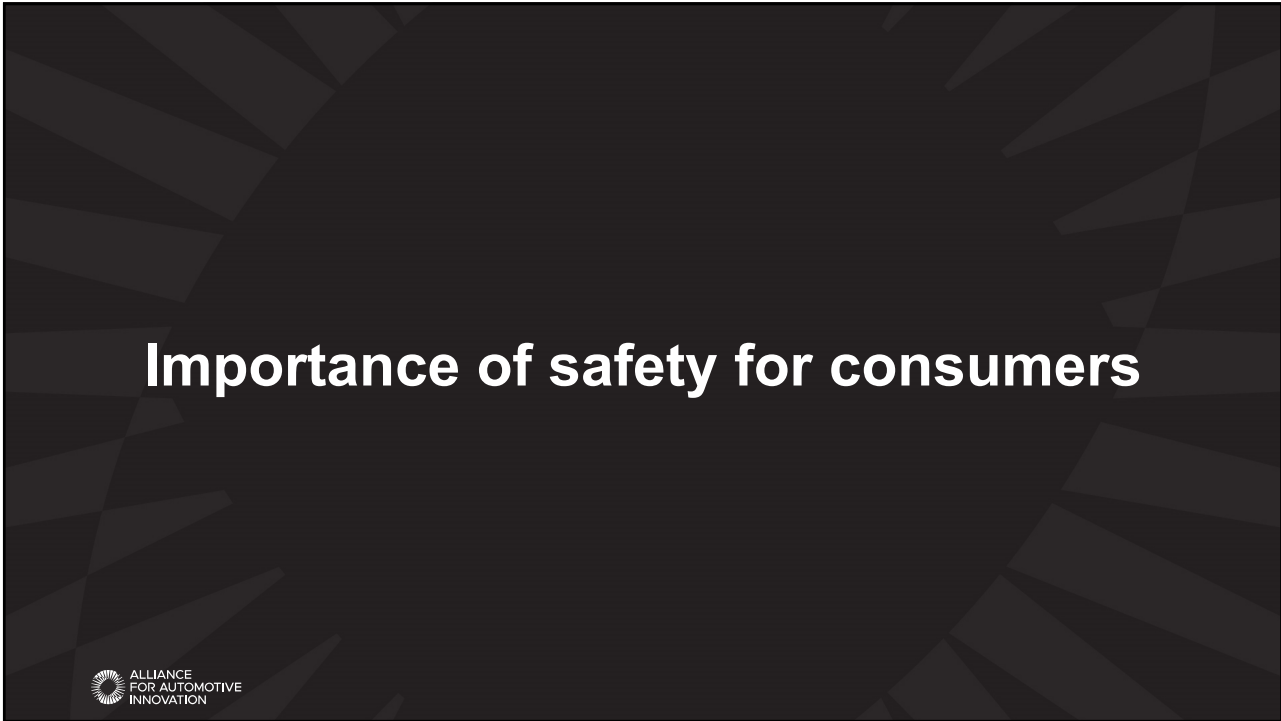
Key issues - Survey Overview & Discussion

Based on survey results, we identified the following key themes for discussion:

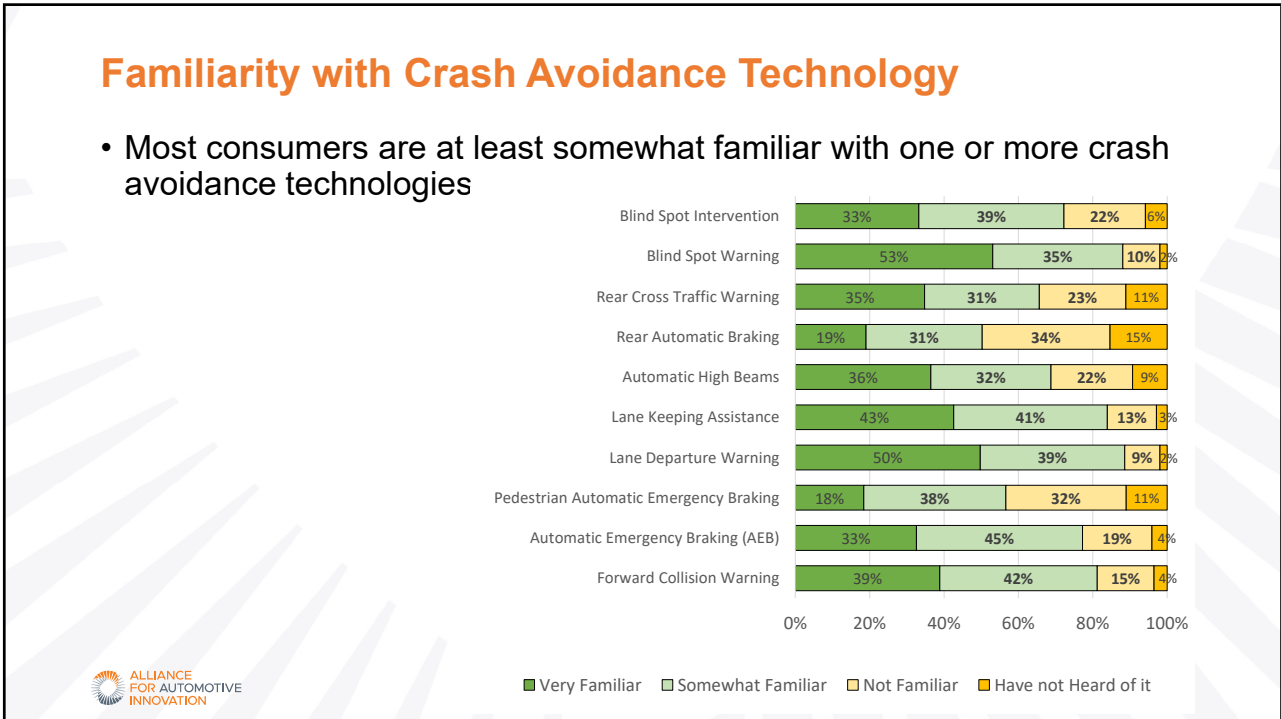
- Importance of safety for consumers
- Sources of information that consumers are utilizing
- Building upon the current ratings structure
- Providing resources for consumers that help drive informed safety decisions
- Monroney label considerations



6



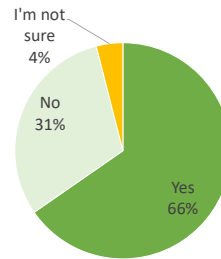
7



8

Perception of Safety

- Two-thirds of survey respondents have a crash avoidance technology in their current vehicle (66%).
- A strong majority of respondents (86%) agreed that it was important that their next vehicle be equipped with crash avoidance technology.
- Most respondents also believed safety ratings were important when considering their next vehicle (93%).



Strongly agree	59%
Somewhat agree	25%
Neither agree nor disagree	11%
Somewhat disagree	3%
Strongly disagree	2%

Very important	60%
Somewhat important	33%
Not important	3%
I have not thought about it before	4%



9


Key Takeaways - Importance of Safety for Consumers

- NCAP can help develop a baseline awareness of new technology and ensure more informed purchasing decisions related to vehicle safety.
- Important to identify opportunities for educating consumers on the benefits of crash avoidance technology.
- Continue efforts to develop standardized nomenclature.



10

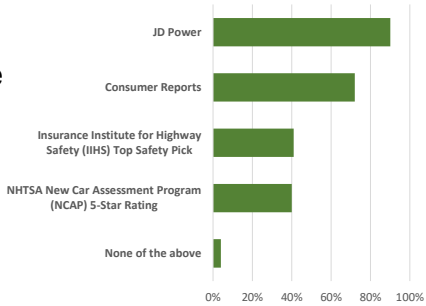
Sources of Information that Consumers are Utilizing



11


Consumer Information Program Recognition

JD Power and Consumer Reports were found to be more frequently recognized by the survey respondents.



However, when asked about the likelihood of using various sources of information, the “vehicle window sticker” was ranked comparatively higher.

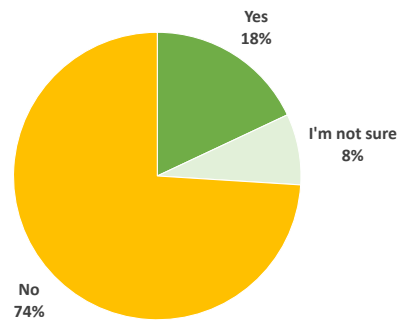
Source	Very Likely to Use	Might Use	Unlikely to Use
Consumer Reports	51%	39%	10%
Manufacturer website	50%	41%	9%
Information provided at the dealership	50%	41%	9%
Vehicle window sticker	50%	38%	12%
JD Power	36%	48%	15%
Insurance Institute for Highway Safety (IIHS) Top Safety Pick	34%	48%	18%
NHTSA New Car Assessment Program (NCAP) 5-Star Rating	31%	49%	20%
YouTube	14%	29%	57%
Social Media (Facebook, Twitter)	9%	23%	68%



12

Consumer Information Program Recognition

- Sources that consumers are likely to use to research vehicle safety information varies. Over half indicated that they are unlikely to use social media.
 - Those in the 55+ age category were less likely to use social media as a source of information (more than 2/3 less likely to use) when compared to those in the 18 to 34-year-old category (approx. 1/3 less likely to use)
- A large percentage of respondents had not used the NHTSA.gov website or app to check a vehicle safety rating.



13

Key Takeaways – Sources of Consumer Information

- There is a need to identify opportunities for increasing awareness of the program to ensure its continued success.
- The approach for reaching consumers may need to vary based on how different groups research new vehicle purchases.
- We encourage regular consumer surveys as part of consistent program review and evaluation to ensure safety ratings information can be effectively communicated.
- We would encourage NHTSA to explore new opportunities for promoting the program through resources that consumers typically use when purchasing a vehicle.



14

Additional Considerations - Sources of Consumer Information

Leveraging NCAP as an effective source of information for consumers:

- JD Power, Consumer Reports not specific to safety. Focused on rating a broad range of attributes.
 - Anecdotally, high DQR (Dependability, Quality, Reliability) is associated with perception of safety.
 - Suggests more in-depth analysis of the sources of information that consumers use inform vehicle purchasing decision.
 - Benchmark with other consumer information programs on how information is accessed by consumers.
- While we encourage the agency to prioritize the modernization of the program, we suggest that NHTSA also explore opportunities for increasing awareness of NCAP either through a standalone agency initiative or a collaborative effort with other stakeholders.



15

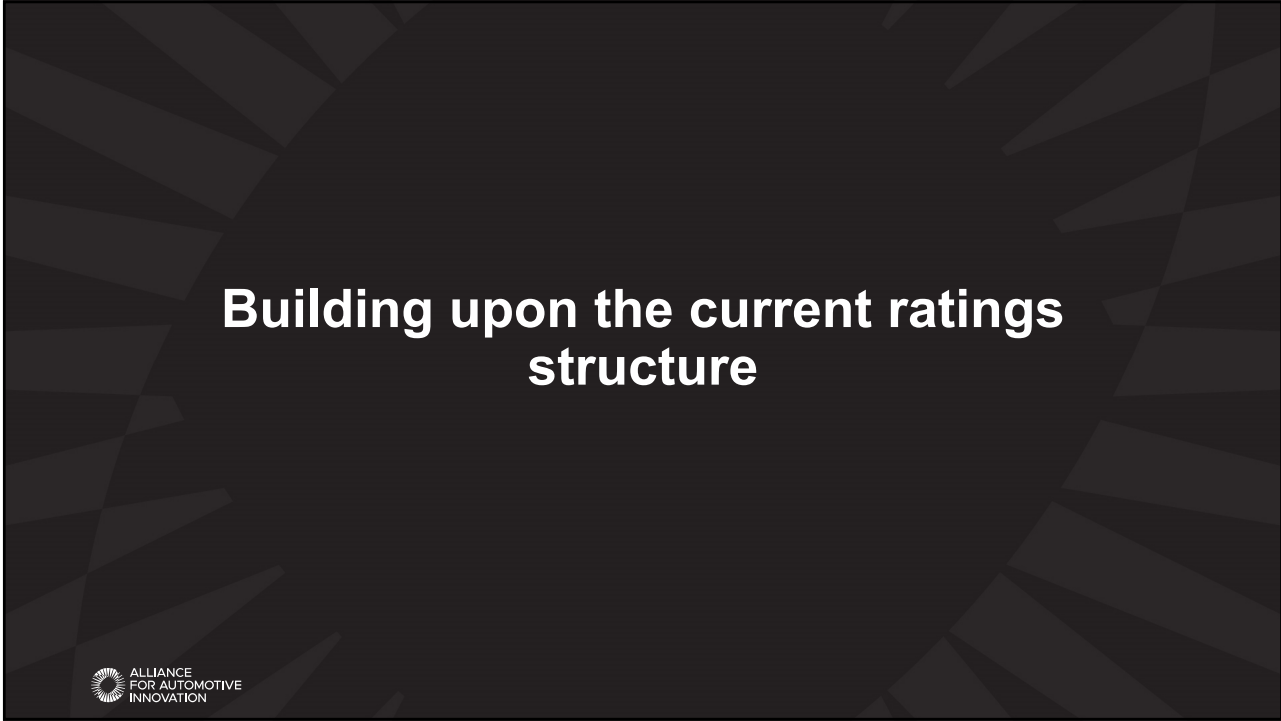
Additional Considerations - Sources of Consumer Information

Leveraging NCAP as an effective source of information for consumers:

- Survey results emphasize the importance of NCAP/window sticker as source of safety info.
 - Review (internally or with marketing/branding consultants) standalone brand recognition and how consumers recognize the program – sometimes it's called NCAP, sometimes 5-stars. There should be recommendations on how to consistently communicate.
- The survey did not explore how consumers accessed various sources of information (e.g., print versus online). For example, younger respondents reported marginally greater awareness of NCAP than older people in the survey.



16



17

Ease of Understanding – 5 Star Rating

- Almost all respondents agreed that the five-star rating was easy to understand and that it allowed ratings to be easily compared between vehicles (with most correctly identifying a higher rated vehicle when presented with two options).

Easy to understand

Response	Percentage
Strongly agree	61%
Somewhat agree	33%
Neither agree nor disagree	5%
Somewhat disagree	1%

Easy to compare vehicles

Strongly agree	59%
Somewhat agree	33%
Neither agree nor disagree	6%
Somewhat disagree	1%

GOVERNMENT 5-STAR SAFETY RATINGS

Overall Vehicle Score ★★★★★
Based on the combined ratings of frontal, side and rollover. Should ONLY be compared to other vehicles of similar size and weight.

Frontal Crash Driver ★★★★★ Passenger ★★★★★
Based on the risk of injury in a frontal impact. Should ONLY be compared to other vehicles of similar size and weight.

Side Crash Front seat ★★★★★ Rear seat ★★★★★
Based on the risk of injury in a side impact.

Rollover ★★★★★
Based on the risk of rollover in a single-vehicle crash.

Star ratings range from 1 to 5 stars (★ ★ ★ ★ ★), with 5 being the highest. Source: National Highway Traffic Safety Administration (NHTSA). www.safercar.gov or 1-888-327-4238

GOVERNMENT 5-STAR SAFETY RATINGS

Overall Vehicle Score ★★★★★
Based on the combined ratings of frontal, side and rollover. Should ONLY be compared to other vehicles of similar size and weight.

Frontal Crash Driver ★★★★★ Passenger ★★★★★
Based on the risk of injury in a frontal impact. Should ONLY be compared to other vehicles of similar size and weight.

Side Crash Front seat ★★★★★ Rear seat ★★★★★
Based on the risk of injury in a side impact.

Rollover ★★★★★
Based on the risk of rollover in a single-vehicle crash.

Star ratings range from 1 to 5 stars (★ ★ ★ ★ ★), with 5 being the highest. Source: National Highway Traffic Safety Administration (NHTSA). www.safercar.gov or 1-888-327-4238

18

Percentage Based Ratings

- Almost three-quarters of participants find the Euro NCAP percentage-based rating system helpful, particularly among younger and middle-aged respondents.
- However, more respondents preferred the star rating (67%) with around one-in-five having no preference.



Helpfulness of Percentage Score

Very helpful	26%
Somewhat helpful	45%
Neutral/not sure	9%
Somewhat unhelpful	14%
Very unhelpful	7%

Preference – Stars vs. Percentage

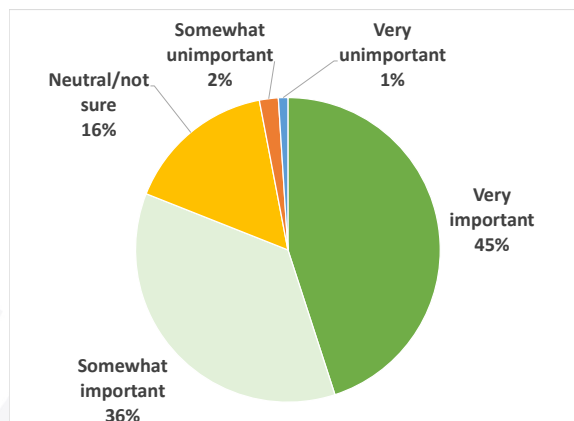
Strongly prefer NHTSA NCAP 5-Star rating system	38%
Prefer NHTSA NCAP 5-Star rating system	28%
No preference	18%
Prefer EuroNCAP star and percentage rating system	11%
Strongly prefer EuroNCAP star and percentage rating system	4%



21

Overall Rating versus Composite Rating

- Most respondents (81%) think it is important that vehicles include an overall rating that combines both the crashworthiness rating and the crash avoidance technology rating.



22

Differentiation – Half-star Rating

- A strong majority of respondents indicated that half stars would be helpful with few indicating they would be unhelpful. Half star should be meaningful to differentiate safety performance.

Half star helpfulness in communicating safety performance?

Very helpful	39%
Somewhat helpful	45%
Neither helpful nor unhelpful/not sure	13%
Somewhat unhelpful	2%
Very unhelpful	1%

- It is also important that clear information on the features that contribute to the rating is provided, including how often features/criteria will be updated.



23

Key Takeaways – Building upon the Current Rating

- As reflected in our 21st Century NCAP recommendations, we are supportive of updating the program to include crash avoidance ratings for technologies that have shown real-world safety benefits.
- NHTSA should maintain a 5-star rating format for establishing the overall crash avoidance rating for a vehicle.
- Based on the survey results, the introduction of a medal or points-based format may add unnecessary complexity and create consumer confusion.
- Consumers inherently understand 5 star more than award-based systems. Simpler is better for the consumer.



24

Key Takeaways – Differentiation and Comparison

- When assessing individual crash avoidance technologies, assessment criteria should be structured to allow for differentiation between various levels of performance; provided such an approach can be supported by real-world crash data.
- How information is presented may also contribute to the success of the program and can help incentivize greater manufacturer engagement. For example, providing consumers with functionality to compare and contrast safety performance could help drive increased voluntary self-certification and testing.



25

Additional Considerations - Differentiation and Comparison

- There are several questions that need to be addressed including how the CA rating is calculated (based on technologies being evaluated), including
 - How the CA and CW scores may contribute to an overall rating
 - How information is communicated to consumers and how it impacts their perception on vehicle safety.
- This further underscores the importance of an NCAP roadmap.
- Auto Innovators is working with members to develop recommendations for how the NCAP rating could be structured and weighted to ensure that relevant consumer information is communicated for both crashworthiness and crash avoidance information.



26

Providing resources for consumers that help drive informed safety decisions

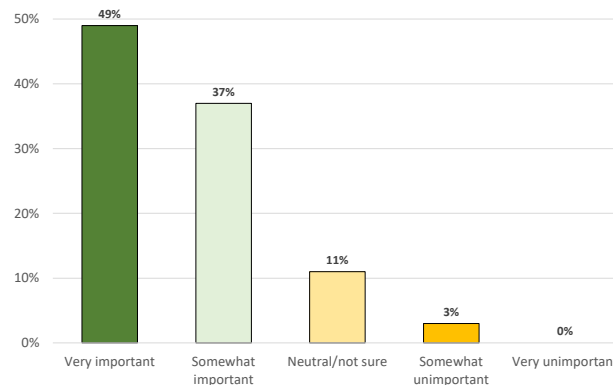


27

Providing Access to Additional Safety Information

- The vast majority of respondents believed it was important to have access to more detailed information on how safety tests are used to determine the overall rating. This can help further educate consumers on available safety features rated as part of the program.

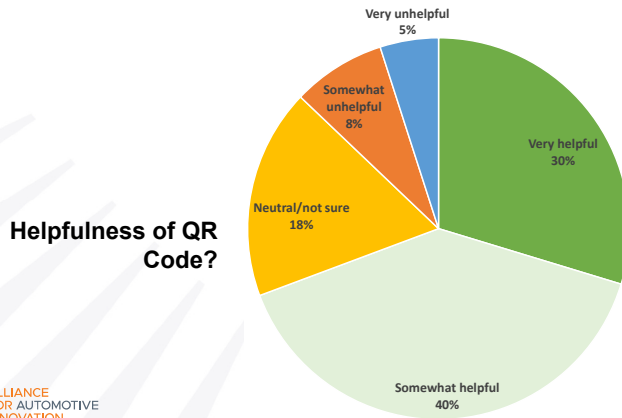
Importance of more detailed safety information



28

Accessibility Considerations / QR Codes

- More than two-thirds of respondents think it would be helpful to include a QR code on the window sticker to provide access to more detailed safety information. Most respondents had access to a smartphone but just under two-thirds of respondents had used a QR code.



Have you used a QR Code?

Yes	63%
No	34%
Not sure how to use a QR code	4%

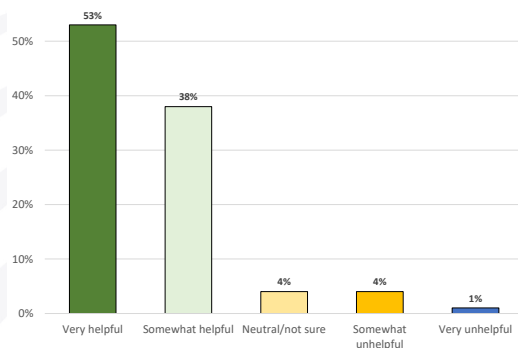


Monroney label considerations



Crash Avoidance Rating Information

- On vehicle window stickers almost all (91%) would find it helpful to have crash avoidance ratings included and many (53%) would like to keep the overall vehicle score and add crash avoidance ratings to the sticker.
- In terms of a more detailed breakdown, more than half would like the crash avoidance rating added to what is already there and another one-third would like no changes at all.



Additional Information and Changes

Include crash avoidance rating and KEEP overall vehicle score	53%
No changes	33%
Include crash avoidance rating and REMOVE overall vehicle score	6%
Only include overall vehicle score	6%
Other	1%

31

Other Monroney Label Considerations

- NHTSA should consider adding a QR code on the window sticker to provide more access to detailed information. This could be useful to educate about the specific tests and the scenarios they address, as well as provide general safety education to increase understanding of how and when systems activate.
- There are challenges related to how much information can fit onto the Monroney label based on current space constraints. However, given the level of recognition by consumers as a source of safety information, it should be an area that is prioritized in addition to the general updates to the program.

32

Conclusion



33

Summary

- The survey highlights the degree to which consumers prioritize safety in their purchasing decisions and the general awareness and presentation of crash avoidance information.
- In addition, the survey points to the following recommendations:
 - Adopt a 5 Star Safety Rating system for crash avoidance. Do not use the medal system.
 - Keep the overall score - include crash avoidance as well as crashworthiness
 - Consider adding half-stars to overall ratings
 - Add a QR code to the vehicle window sticker to link to more safety information.
- Survey provides an example of a type of analysis that NHTSA should conduct regularly to assess consumers' perspectives and inform future program changes for how information is communicated.



34