

May 19, 2022

The Honorable Steven Cliff  
Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Agency Information Collection Activities; Notice and Request for Comment; Survey on Driver Awareness of Motorcycles Docket No. NHTSA-2022-07358**

Dear Administrator Cliff,

On April 7, 2022, the National Highway Traffic Safety Administration (NHTSA) published in the Federal Register a Notice and request for comments on a request for approval titled “Agency Information Collection Activities; Notice and Request for Comment; Survey on Driver Awareness of Motorcycles”. The National Association of Mutual Insurance Companies (NAMIC) welcomes the opportunity to respond to this request for comments related to NHTSA’s proposed information gathered Driver Awareness of Motorcycles.

NAMIC is the largest property/casualty insurance trade group with a diverse membership of more than 1,500 local, regional, and national member companies, including seven of the top 10 property/casualty insurers in the United States. NAMIC members lead the personal lines sector representing 55 percent of the auto market. Through our advocacy programs we promote public policy solutions that benefit NAMIC member companies and the policyholders they serve and foster greater understanding and recognition of the unique alignment of interests between management and policyholders of mutual companies.

NHTSA is seeking approval to collect information from motor vehicle driver to report their knowledge, attitudes, and awareness of safe-driving behaviors towards motorcycles. NHTSA was established by the Highway Safety Act of 1970 to reduce deaths, injuries, and economic losses resulting from motor vehicle crashes on the Nation's highways. To further its mission, NHTSA is authorized to conduct research as a foundation for the development of traffic safety programs. Title 23, United States Code, Section 403, gives the Secretary of Transportation (NHTSA by delegation) authorization to use funds appropriated to conduct research and development activities, including demonstration projects and the collection and analysis of highway and motor vehicle safety data and related information, with respect to all aspects of highway and traffic safety systems and conditions

relating to vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics; accident causation and investigations; and human behavioral factors and their effect on highway and traffic safety.

The Notice makes clear that motorcycle safety is an increasing safety concern in highway transportation, with motorcyclist fatalities in 2019 occurring nearly 29 times more frequently than passenger car occupant fatalities in traffic crashes, and with an estimated 84,000 motorcyclists injured in 2019. The Notice also provides that the most harmful event for 55 percent of the 5,114 motorcycles involved in fatal crashes in 2019 was a collision with another motor vehicle; and in two-vehicle crashes, 76 percent of the motorcycles involved in fatal crashes were struck in the front. Accordingly, NHTSA strategies for improving motorcycle safety include addressing other motorists' perceptions and awareness of motorcycles.

The information collection activities detailed in the Notice will help identify underlying driving behaviors towards motorcycles and inform the development of potential countermeasures to improve the safety of interactions between motor vehicles, specifically, motorcycles, and other vehicle types. NHTSA's estimates of the practical utility seem warranted as does the accuracy of the estimate of the burden of the proposed information collection. At this time, NAMIC has no suggestions to enhance the information to be collected or to minimize the burden of the collection of information.

To conclude, NAMIC supports the initiative of NHTSA in this regard to address the issue of obtaining and using more owner data to enhance road and traffic safety. If you have and questions of comments, please feel free to contact us.

Sincerely,



Thomas J. Karol

General Counsel – Federal  
National Association of Mutual Insurance Companies