

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;
National Survey of Pedestrian and Bicyclist Attitudes, Knowledge, and Behaviors
Docket No. NHTSA-2021-0051**

Dear Administrator Cliff,

On April 4, 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; National Survey of Pedestrian and Bicyclist Attitudes, Knowledge, and Behaviors”. The National Association of Mutual Insurance Companies (NAMIC) welcomes the opportunity to respond to this request for comments related to the National Survey of Pedestrian and Bicyclist Attitudes, Knowledge, and Behaviors.

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.

NAMIC fully concurs with NHTSA that pedestrians and bicyclists are among the most vulnerable road users. As noted in the proposal, motor vehicle crashes in 2019 accounted for 6,205 pedestrian fatalities and 846 bicyclist and other cyclist fatalities, and 76,000 pedestrians and 49,000 bicyclists were injured in traffic crashes.

Additionally, the Governors Highway Safety Administration reports that drivers struck and killed an estimated 7,485 people on foot in 2021 – an average of 20 deaths a day.¹ The recent increases in walking and bicycling may have contributed to this increase in exposure to potential risk of collision with motor vehicles. This, in turn, supports NHTSA’s proposed pedestrian and bicyclist safety programs to reduce injuries and fatalities, which will require data collection to assess how the programs can best continue to promote highway and auto safety as it relates to pedestrians and bicyclists.

The proposal notes that 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.

NHTSA plans to enhance its National Survey of Pedestrian and Bicyclist Attitudes, Knowledge, and Behaviors to examine the extent to which Americans engage in walking and bicycling activity, their attitudes towards and experience with various facilities, road conditions, and technologies, and their opinions on pedestrian and bicycling safety topics. NHTSA will use the information to produce a technical report to be shared with State highway offices, local governments, and those who develop traffic safety communications that aim to reduce pedestrian and bicyclist crashes.

NAMIC supports NHTSA’s proposed collection of information as necessary and appropriate and believes that the information surveyed will have significant practical utility. Although we are not experts in this area, NHTSA’s estimate of the burden and the quality, utility and clarity of the information to be collected certainly seem appropriate and will help our members in their efforts to work with you, state legislators and regulators, and appropriate law enforcement agencies to improve road safety and communication about pedestrian and bicyclist risks as informed by the information gathered. To conclude, NAMIC supports the initiative of NHTSA in this regard to address the issue of obtaining and using more pedestrian and bicyclist data to enhance road and traffic safety. If we 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

¹ <https://www.ghsa.org/resources/news-releases/GHSA/Ped-Spotlight-Full-Report22>