

May 4, 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;  
Evaluation of the Model Minimum Uniform Crash Criteria Program Docket No.  
NHTSA-2022-0028**

Dear Administrator Cliff,

On March 29, 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; Evaluation of the Model Minimum Uniform Crash Criteria Program”. The National Association of Mutual Insurance Companies (NAMIC) welcomes the opportunity to respond to this request for comments related to an evaluation of the Model Minimum Uniform Crash Criteria (MMUCC) program.

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 MMUCC, the voluntary, minimum set of standardized data variables for describing motor vehicle traffic crashes, promotes data uniformity within the highway safety community by creating a foundation for State crash data systems to provide the information necessary to improve highway safety. The insurance industry appreciates the value of that crash data being used to identify issues of concern, assess highway safety, inform decision-makers about needed highway safety legislation, and evaluate the impact of highway safety countermeasures. NAMIC also understands that States' adoption of MMUCC variables has not been as complete and consistent as the program could be for ideal and complete information.

To address this gap, NHTSA has proposed conducting an electronic survey of a national sample of some of the law enforcement officers who complete crash reports. The survey will ask respondents to review fictitious crash scenarios and collect the MMUCC data variables, and to solicit input on the accuracy of data is collected and provide suggestions for improving each data variable as needed.

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 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 crash data to enhance road and traffic safety. If we you have and questions of comments, please feel free to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas J. Karol', with a large, stylized initial 'T'.

Thomas J. Karol

General Counsel – Federal  
National Association of Mutual Insurance Companies