

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;  
Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS) Docket  
No. NHTSA-2022-0031**

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; 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 the Fatal Analysis Reporting System (FARS) and the Non-Traffic Surveillance (NTS) 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.

Under 49 U.S.C. 30182 and 23 U.S.C. 403, NHTSA is authorized to collect data on motor vehicle traffic crashes to aid in the identification of issues and the development, implementation, and evaluation of motor vehicle and highway safety countermeasures to reduce fatalities and the property damage associated with motor vehicle crashes. NHTSA has implemented FARS and NTS to collect data on fatal motor vehicle traffic crashes, which supports the establishment and enforcement of highway safety programs.

FARS data is used extensively by all the NHTSA program and research offices, other Department of Transportation offices, States, and local jurisdictions. Congress uses the FARS data for making decisions concerning safety programs. The FARS data are also available upon request to anyone interested in highway safety. This data is used extensively by NAMIC and our insurer members to better understand and improve highway and auto safety, and to communicate with state legislators and regulators about the conditions facing drivers across the country.

NAMIC fully 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; we encourage and look forward to participating in continued public discussion around the important results when such data is collected and published.

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 you have any questions or comments, please feel free to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Karol', with a stylized flourish at the end.

Thomas J. Karol

General Counsel – Federal  
National Association of Mutual Insurance Companies