

May 18, 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; Field Study of Heavy Vehicle Crash Avoidance Systems Docket No. NHTSA-2022-10012

Dear Administrator Cliff,

On May 10, 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; Field Study of Heavy Vehicle Crash Avoidance Systems”. The National Association of Mutual Insurance Companies (NAMIC) welcomes the opportunity to respond to this request for comments related to NHTSA’s proposed information gathering.

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 gathering information regarding drivers' experiences and opinions about crash avoidance systems (CAS) consisting of Lane Departure Warning, Forward Collision Warning, Impact Alert, and Automatic Emergency Braking for heavy vehicles. In the Notice, NHTSA provides that the newest generation of CAS technology includes several new features, such as multiple sensors, improvements to radar algorithms, and new features such as full braking in response to static objects or pedestrians.

NHTSA makes clear in the Notice, however, that they remain unsure if this newest generation of products has been able to reduce the prevalence of false or nuisance alerts observed in the previous study, if there are any issues with new types of alerts that have been added since previous studies, or whether drivers have negative perceptions of the technology due to the new products or alerts.

Based upon the information provided in the Notice, NAMIC agrees that the proposed collection of information is necessary for the NHTSA to further determine whether these products has been able to reduce the prevalence of false or nuisance alerts observed in the previous study, if there are any issues with new types of alerts that have been added since previous studies, or whether drivers have negative perceptions of the technology due to these issues. Based upon the information set out in the Notice, the burdens estimated by NHTSA for the collection seem accurate and appropriate to obtain the quality and quantity of information sought by NHTSA for this valid purpose.

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 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