



July 12, 2022

The Honorable Pete Buttigieg
Secretary, U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Comments submitted electronically: <https://www.regulations.gov>

RE: Federal Register Docket – NHTSA-2022-0030

Dear Secretary Buttigieg:

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to respond to the National Highway Traffic Safety Administration's (NHTSA's) *State Electronic Data Collection Grant Program Request for Information*, Docket NHTSA-2022-0030. WSDOT is submitting the following comments for consideration as NHTSA moves forward in developing this new program.

Data Standardization and Modernization of Information Technology

Question 1: *What are the State's current methodologies for collecting and standardizing statewide crash data electronically in a central repository?*

The Washington State Patrol (WSP) uses a memorandum of understanding (MOU) to give custodial responsibility of Washington's crash system to WSDOT. The Statewide Crash & Ticket Online Records (SECTOR) software is the largest single crash data collection system used by law enforcement agencies. The Electronic Traffic Records Information Processing (eTRIP) Initiative provides this software application to all law enforcement agencies at no cost. SECTOR is governed by the eTRIP Operation Managers Group which has representatives from WSDOT, WSP, Department of Licensing, Administrative Office of the Courts, Washington Association of Sheriffs and Police Chiefs, Washington Information Technology Oversight Group (WaTech) and the Traffic Records Governance Council (TRGC). This governance team is responsible for the operation and oversight of SECTOR. To use this software, eTRIP requires a MOU prior to the agency submitting reports.

For those not using SECTOR, eTRIP must evaluate an agency's crash data collection system prior to submitting electronic reports. The evaluation looks at the software validation rules for filling out the crash form. These rules are compared to those that are

used within the state-provided software. The eTRIP committee of the Washington TRGC and the WSDOT Crash Data and Reporting Office develop the core validation rules within SECTOR.

Question 2: *NHTSA relies on MMUCC to establish a standardized data set. What steps are required for the State to meet this standardization?*

WSDOT supports the use of MMUCC to establish a standardized dataset. However, WSDOT does not collect all MMUCC data elements through the state's crash form. WSDOT staff derive several MMUCC data elements because of their analysis of the record. Currently, WSDOT crash data repository has a 67% match to the MMUCC standardization. To achieve better standardization, WSDOT will have to partner with the eTRIP partners to update the state's crash form.

Question 2a: *Please provide an estimated timeline to implement MMUCC standardization.*

It is estimated that it would take 24 months to update the state's crash form and the state's two electronic crash reporting applications along with all the state agencies and law enforcement back-end systems to achieve better standardization with MMUCC.

Law Enforcement Electronic Crash Reporting

Question 8: *What percentage or number of the State's law enforcement agencies collect motor vehicle traffic crash information using an electronic crash report/records management system?*

In 2021, 98.3%, or 232, law enforcement agencies submitted crash reports using the State's electronic crash report/records management system.

Question 8a: *Are all law enforcement agencies in the State collecting motor vehicle traffic crash information via an electronic crash report/records management system using the same application?*

No, nine (9) law enforcement agencies in the state use their own crash report/records management system which is called Enforcer.

Question 8b: *For law enforcement agencies collecting motor vehicle traffic crash information using an electronic crash report/records management system, what application is used?*

The main application used by law enforcement in Washington is the Statewide Crash & Ticketing Online Records (SECTOR).

Question 9: *What percentage or number of law enforcement agencies solely use paper crash reports in the crash reporting process?*

Less than 1%, or 12, law enforcement agencies submit crash reports solely using paper crash reports in the crash reporting process.

Question 9a: *If so, are these paper reports coded into the centralized statewide crash repository?*

All crash reports submitted using paper crash forms are coded into the centralized statewide crash repository.

Question 9b: *Describe any law enforcement's reservations for participating in electronic crash reporting to document motor vehicle traffic crash information?*

Six (6) of the law enforcement agencies that submit crash reports solely on paper forms are small agencies that investigate and support 10 or less crashes per year. The remaining six (6) agencies are tribal agencies who refrain from providing data regarding their tribal members to government entity databases.

Question 9c: *Specify the needs and costs for law enforcement agencies to adopt electronic-crash reporting to document motor vehicle traffic crash information?*

The cost to law enforcement agencies to adopt and participate in the state electronic crash reporting system is free. However, law enforcement agencies are responsible for the costs of laptops, portable printers, and handheld scanners. Currently, this is estimated to cost \$4,350 per unit. This also includes the replacement of the equipment and any associated licenses.

Data Management

Question 12: *Does the State, in its crash data, distinguish between crash types between self-reported and police reported crashes?*

Yes, the state distinguishes the difference in self-reported and police investigated reported crashes. This is done by the seven-digit crash report number. However, in 2009, after a study on the quality of self-reported crashes, WSDOT stopped adding these types of records into the statewide crash data repository. Self-reported crashes are available through the WSP.

Question 13: *Does the State include variables to identify State-reportable vs. non-reportable crashes?*

Yes, WSDOT includes variables to identify state-reportable vs. non-reportable in its crash record.

Data Accessibility to the Public

Question 14: *Please provide recommendations on the format types for publicly available State crash data.*

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WSDOT has been successful when utilizing PDF and Excel as document format types along with our Crash Data Portal for releasing crash data publicly. The topic-specific tableau dashboards from NHTSA are useful for visualizations and queries when users cannot easily handle direct downloads or need more flexibility than PDF.

Question 15: *What State products and services that include State crash data does the State find are most helpful to the public?*

WSDOT's Crash Data Public Portal receives an average of 100+ views a day. This portal provides summary data as well as information that focuses on the Washington State Target Zero goals.

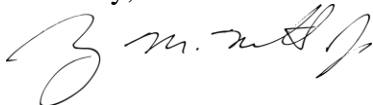
We also find that our Standard Accident history report is another tool that is helpful to the public. For customers who need a larger data set we provide a CSV file of crash data containing crash and participant level information that will allow the requester to review the data in various ways.

Visualizations are useful, including maps and charts of aggregate information. NHTSA's new tableau dashboards, such as for pedestrians and heavy trucks, are useful for presentations and brief publications.

Most states will likely turn to their own state data when that is all that is needed. National data is most useful for making state-to-state comparisons so streamlining and building access to perform these types of comparisons on different topics would be useful.

Thank you for your consideration of these comments. If you would like to discuss this issue any further, please contact Kerri Woehler, Multimodal Planning and Data Division Director at (360) 705-7958.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Millar". The signature is fluid and cursive, with a large initial "R" and a stylized "M".

Roger Millar, PE, FASCE, FAICP
Secretary of Transportation