



November 7, 2022

By regulations.gov

National Highway Traffic Safety Administration (NHTSA)
Docket Management Facility (M-30)
West Building, Ground Floor, Room W12-140
1200 New Jersey Avenue S.E.
Washington, DC 20590

Re: Agency Information Collection (ICR) Activities; Request
for Comment; Government 5-Star Safety Ratings Label
Consumer Research; Doc. No. NHTSA-2021-0033.

Ladies and Gentlemen:

The National Automobile Dealers Association (NADA) represents over 16,000 franchised automobile and truck dealerships that sell new and used motor vehicles and engage in service, repair, and parts sales. Together they employ more than 1,100,000 people nationwide, yet most are small businesses as defined by the Small Business Administration.

Last month, NHTSA requested comment on a review by the Office of Management and Budget of a new information collection request (ICR) for consumer research on the New Car Assessment Program (NCAP) 5-Star Safety Ratings section of the Monroney Label.¹ The notice specifies that NHTSA intends to “conduct qualitative research using focus groups in four geographic markets located across the country to evaluate design and consumer information improvements to the Government 5-Star Safety Ratings section of the Monroney label.”² NHTSA states that it will “use the findings from this research to support planned changes to the current label requirements and future designs for communicating vehicle safety ratings and advanced driver assistance systems performance assessments to consumers.”³ NHTSA previously sought comment on its proposed research on April 28, 2020 and November 19, 2021. The current notice responds to comments filed in response to the latter notice.⁴

NHTSA has responded to NADA’s comment on focus group participant selection by deciding to limit focus group participants to “licensed drivers, age 18+ who are either a primary or shared decision-maker for vehicle purchases in the household, have either recently purchased a motor vehicle (last 6 months) OR who are likely to do so in the next 12 months.”⁵ Because Monroney label information is exclusively used by prospective new motor vehicle purchasers to make

¹ 87 Fed. Reg. 60744, *et seq.* (Oct. 6, 2022).

² 87 Fed. Reg. at 60744.

³ *Id.*

⁴ 86 Fed. Reg. 64989 (November 19, 2021).

⁵ 87 Fed. Reg. 60745.

useful comparisons between vehicle make/models, limiting focus group participants in this manner will help ensure that they are best suited to evaluate what NHTSA presents, and to provide the agency with helpful responses.

NHTSA has also attempted to address the lack of information in its November 19, 2021, notice on the anticipated research methodology.⁶ NADA generally supports NHTSA's approach for how participants should review and evaluate the existing label and new design concepts, but again urges the agency to defer its research on the effectiveness of potential new NCAP label designs until after it outlines the specific label changes it intends to present for evaluation and after providing for stakeholder comment on those potential changes.⁷ Allowing NADA and other stakeholders the opportunity to evaluate that information and to provide input before focus groups are conducted will make the focus group process more useful, productive, and efficient.

On behalf of NADA, I thank NHTSA for the opportunity to comment on this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Douglas I. Greenhaus". The signature is written in a cursive, flowing style.

Douglas I. Greenhaus
V.P., Regulatory Affairs,
Environment, Health, and Safety

⁶ Id.

⁷ In footnote 6 of its Notice, NHTSA indicated that additional information on its research methodology is found in background documents accessible on OMB's webpage, however NADA was unable to locate such documents, let alone determine whether NHTSA has laid out any new design concepts in them. NADA reiterates the concerns expressed in its [comments](#) on NHTSA's Notice on the New Car Assessment Program (87 Fed. Reg. 13452) that too much information on the NCAP label will confuse consumers and dilute the importance of the safety information being conveyed. NADA supports the use of QR codes that link to additional information on NHTSA's website and urges NHTSA to incorporate QR codes in its new design concepts to both lessen clutter and ensure that only the most pertinent safety information appears on the NCAP label.