

November 18, 2022

Ms. Ann Carlson  
Acting Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Agency Information Collection Activities; Notice and Request for Comment; Crash Report Sampling System (CRSS), Non-Traffic Surveillance (NTS) and Special Studies Data Collection: DOT-OST- 2922-0049, Document Number: 2022-21037**

Dear Acting Administrator Carlson:

On September 28, 2022, the National Highway Traffic Safety Administration (“NHTSA”) published in the Federal Register a Notice and request for comments on a request for extension with modification of a currently approved information collection for a proposed collection of information for NHTSA's Crash Report Sampling System (“CRSS”), Non-Traffic Surveillance (“NTS”), and special studies. (the “Notice”). The National Association of Mutual Insurance Companies (“NAMIC”) welcomes the opportunity to respond to this request for comments.

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 ten 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.

As detailed in the Notice, NHTSA uses CRSS and NTS to collect data on motor vehicle crash, including crashes involving injuries and fatalities, property damage only crashes, as well as non-traffic crashes that involve injuries and fatalities. NHTSA uses information from these data collections to support NHTSA's mission to save lives, prevent injuries, and reduce economic losses resulting from motor vehicle crashes.

CRSS obtains data from a nationally representative probability sample selected from police reported motor vehicle traffic crashes. Specifically, CRSS collects data on crashes involving at least one motor vehicle in transport on a trafficway that resulted in property damage, injury or a fatality will be included in the CRSS sample. CRSS data is used extensively by all the NHTSA program and research offices, States, and local jurisdictions. The highway research community uses the CRSS data for trend analysis, problem identification, and program evaluation. Congress uses the CRSS data for making decisions concerning safety programs. The CRSS data is made publicly available.

NTS is a data collection effort for collecting information about counts and details regarding fatalities and injuries that occur in non-traffic crashes and non-crash incidents. Non-traffic crashes are crashes that occur off a public trafficway (e.g., private roads, parking lots, or driveways), and non-crash incidents are incidents involving motor vehicles but do not involve a crash scenario, such as carbon monoxide poisoning and hypo/hyperthermia. NTS is a Congressionally mandated data collection effort, which provides counts and details regarding injuries and fatalities that occur in non-traffic crashes and in non-crash incidents. NTS annual data is used to produce estimates for injuries and fatalities in non-traffic crashes. The NTS data is also made publicly available.

The Notice requests comments on whether the proposed collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility. To that question, NAMIC responds with a resounding “Yes, this work is critical for the proper performance of the functions of NHTSA and there is every reason to believe that the results of the study will have great practical utility.” NAMIC is supportive of the Notice as another positive step in the possible range of crash and safety data collection and reporting. NAMIC also encourages enhanced relationships and partnerships between NHTSA and state and local police jurisdictions. NAMIC applauds the Notice as worthwhile action by NHTSA, and strongly urges NHTSA to consider proposing more wide, extensive, and granular auto safety and crash data recording and reporting.

We do suggest that the insurance industry may have experience and expertise that could be relevant to the Collection, analysis and use of the information collected. Specifically, the insurance industry may be able to provide NHTSA with advice and recommendations on specific metrics, key performance indicators, and measures of success. Insurance experience could also be valuable in validating ways for the Department to enhance the quality, utility, and clarity of the information collection. NAMIC would be most interested in working with NHTSA on these areas.

If you have any questions or require further information, please contact me at [tkarol@namic.org](mailto:tkarol@namic.org).



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