

March __, 2023

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

Re: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Request for Comment; Influence of Drivers' Internal Reasoning on Speeding; Agency/Docket Number: Docket No. NHTSA-2022-0045, Document Number: 2023-04037

Dear Acting Administrator Carlson:

On January 28, 2023, the National Highway Traffic Safety Administration (“NHTSA”) published in the Federal Register a Notice and request for comments on a proposed collection of information for a one-time voluntary survey of licensed drivers regarding speeding (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, speeding continues to be a major safety problem. In 2020, speeding was a contributing factor in 29% of fatal, 13% of injury, and 10% of property-damage-only crashes. Motor vehicle crashes in 2020 where at least one driver was speeding accounted for more than 11,000 fatalities.

The Notice states that NHTSA is interested in designing countermeasures that address directly the factors that influence speeding behavior and intention to engage in this behavior, and it is necessary for NHTSA to understand as much as possible about the internal reasoning of drivers who speed. NHTSA, in coordination with the Washington Traffic Safety Commission and Washington Department of Licensing, proposes to survey 1,500 licensed drivers in Washington State age 18 and older to survey drivers in the State; some who received one or more speeding convictions in the last three years and others not convicted of speeding in that same timeframe.

NHTSA will use the findings to assist States, localities, and communities in developing and refining countermeasures that will aid in their efforts to reduce speeding behavior and speeding-related crashes and injuries. NHTSA will disseminate the information from this study in a technical report. The technical report will provide aggregate (summary) statistics and tables as well as the results of statistical analysis of the information, but it will not include any personally identifiable information.

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 testing, safety data collection, and reporting. NAMIC applauds the Notice as worthwhile action by NHTSA, and strongly urges NHTSA to consider proposing more wide and extensive auto safety data recording and reporting.

The Notice also requests ways to enhance the quality, utility and clarity of the information to be collected, and we respectfully recommend that NHTSA seek input from the insurance industry, which has experience and expertise that is likely relevant to the goals proposed in the Notice. Specifically, the insurance industry may be able to provide NHTSA with advice and recommendations on specific metrics, key performance indicators, and measures of success that NHTSA may propose for the performance and efficacy of the proposed study. NAMIC would be most interested in working with NHTSA on these areas of study, analysis, reporting of results, and recommendations for stakeholders.

If you have any questions or require further information, please contact me at tkarol@namic.org. Thank you for your time and consideration.



Thomas J. Karol

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National Association of Mutual Insurance Companies