

March 13, 2023

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; Older Driver Rearview Video Systems; Agency/Docket Number: Docket No. NHTSA-2022-0108, Document Number: 2023-00460

Dear Acting Administrator Carlson:

On January 12, 2023, the National Highway Traffic Safety Administration (“NHTSA”) published in the Federal Register a Notice and request for comments on a reinstatement of previously approved information collection to reinstate an information collection to recruit 120 older licensed drivers, 60 between ages 60 and 69 and 60 age 70 and older, for a one-time voluntary research study to assess whether training on the use of Rear Video Systems (RVS) improves the ability of older drivers to back safely (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, older adults comprise an increasing proportion of the driving population, and the independent mobility that driving confers improves older adults' access to the goods and services they need and enhances their ability to take part in community and family activities that support quality of life. New vehicle technologies, like RVS, may help compensate for some age-

related deficits and keep older adults driving safely. The notice also states that older drivers may have an elevated safety risk associated with backing crashes based upon known age-related deficits. Many older drivers have musculoskeletal difficulties that limit their ability to turn and scan behind the vehicle. The Notice suggests that older drivers may be at elevated risk of crashes due to inadequate surveillance compared to younger drivers, supported by their over-representation in backing crashes per licensed driver.

The Notice goes on to suggest that RVS may offer more potential benefits to older drivers by compensating for the age-related decline in the ability to rotate one's body, and the likelihood that older drivers have less adequate surveillance or scanning than younger drivers. A study referenced in the Notice found that RVS reduced backing crash involvement among drivers seventy and older by 36%.

NAMIC does not have any relevant responses to the Notice questions on the accuracy of the Department's estimate of the burden of the proposed information collection; ways to enhance the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information on respondents, including the use of automated collection techniques or other forms of information technology.

We do recommend you continue to seek input from the insurance industry, who have 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. Insurance experience could also be valuable in validating the testing and efficacy of RVS in different scenarios and how that performance data could be generated. NAMIC would be most interested in working with NHTSA on these areas of study and analysis.

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.

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

A handwritten signature in blue ink, appearing to read 'TKAROL', with a large, sweeping flourish at the end.

Thomas J. Karol

General Counsel – Federal
National Association of Mutual Insurance Companies