



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Transportation and Public Facilities

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Docket Management Facility  
US Department of Transportation  
1200 New Jersey Avenue SE  
West Building, Room W12-140  
Washington, DC 20590

Comments submitted electronically to [www.regulations.gov](http://www.regulations.gov)

Subject: Draft Model Minimum Uniform Crash Criteria Guideline, Sixth Edition,  
Request for Public Comment (Docket No. NHTSA-2023-0002)

Dear Associate Administrator Chou Lin Chen:

The Alaska Department of Transportation and Public Facilities (DOT&PF) appreciates the opportunity to provide input to the National Highway Traffic Safety Administration (NHTSA) in response to the Request for Comment on the Draft Model Minimum Uniform Crash Criteria Guideline (MMUCC), Sixth Edition, published on February 1, 2023.

Alaska's public health, traffic safety, roadway, and law enforcement agencies all rely on crash event reporting. Knowing where high-severity crashes take place allow the State to respond to hazardous conditions. However, the data from lower-severity crashes and near-miss events allows us to get ahead of the issue and prevent the next high-severity crashes. We have found that near-misses and low-severity property damage crashes are not reported as often since Alaska implemented MMUCC compliant forms.

- Upon implementation of a MMUCC-compliant crash report form in 2013, Alaska experienced an immediate and sustained decline in the number of crash reports filed.
- The overall number of reported crashes between 2013 and 2020 declined by approximately 35%, officer reports declined by 29%, and self-reported crashes declined by 43%.
- We believe this is related to the significant increase in data fields that MMUCC compliance requires.

*"Keep Alaska Moving through service and infrastructure."*

In our opinion, reducing the number of fields in the MMUCC will encourage officers and the public to report no- and low-damage crashes and near misses. We believe that the purpose of the MMUCC should be to support law enforcement and safety decision making. Therefore, each mandatory field should support at least one of these two goals; a thoughtful redesign of the MMUCC fields will focus attention and energy on the fundamental pieces of information that define less safe driver behavior.

The existing MMUCC includes several items and variables which provide information that does not support significant safety or law enforcement improvements. While they provide data that is interesting or useful, it is not mission-critical, and including these fields unnecessarily lengthen the data-collection process. Consider, for example, the following:

- Item C3 (Time of Roadway Clearance): This data point is useful to traffic operations management, but not mission-critical to improving safety or compliance with the law.
- Items D7 (Attempted Avoidance Maneuver) and D8 (Driver's Vision Obscured By) have 15 and 18 attributes, respectively, that an officer must evaluate in hazardous roadside conditions.

Individual states or other jurisdictions could choose to include these items or attribute options, even if MMUCC criteria does not include them as a part of the recommended minimum dataset. For the above reasons, we advise NHTSA to take these actions in future versions of the MMUCC:

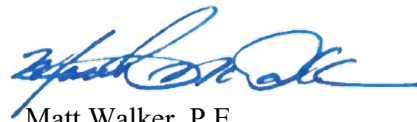
1. Initiate a study to establish the quantity of data points that could be reasonably evaluated and completed in the field in a length of time that law enforcement agencies feel is appropriate. A part of this evaluation should include the frequency of null or default responses to each data element.
2. Limit fields and subfields to data points known to support substantial improvements to mission-critical law enforcement and safety goals. This would focus on participant identification, driver behavior, and a limited number of physical factors.
3. Implement a hard total of the number of points requiring individual data entry; if a new item is desired, an older item must be retired.

Thank you for your consideration of our comments.

Sincerely,

*Tammy Kramer*

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