

June 1, 2023

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

**Request for Comments; CISS Expansion. Docket No. NHTSA-2023-0016.**

Dear Ms. Carlson:

The Insurance Institute for Highway Safety (IIHS) welcomes the opportunity to comment on the National Highway Traffic Safety Administration's (NHTSA's) expansion efforts for its Crash Investigation Sampling System (CISS) resource. IIHS supports these expansion efforts and offers a few recommendations.

**Consider targeted sampling of expanded crash types and the role of on-scene data collection**

Adding currently excluded crash types is an important goal, but simply adding them to the main sampling procedures may introduce undue complexity and cost, and NHTSA should consider whether targeted sampling of some of these crash types would be a more efficient approach. NHTSA also should consider prioritizing on-scene data collection methods for certain types of crashes. For example, crashes involving pedestrians/bicyclists or truck underride may rely more heavily on on-scene data collection compared with crashes between two passenger vehicles. Thus, targeted sampling of such crash types may be more efficient than developing on-scene capability for all data collection sites or using it for all types of crashes.

**Fix the missing height/weight issue**

The rate at which drivers' height and weight were unknown doubled from about 23% each year during 2017–2019 to about 54% in 2020 and in 2021. While it is understandable that pandemic precautions may have played a role in this, NHTSA should prioritize the full collection of these data elements as they are crucial for studying many things, including differences in injury risk/type between males and females.

**Expand EDR data collection**

Electronic data recorder (EDR) data are incredibly useful in understanding impact speed, and a major opportunity is to collect these data in crashes with pedestrians and bicyclists since delta-V estimates cannot be derived from vehicle damage in these crashes. However, this presents a challenge as collecting EDR data is more complicated when the airbag does not deploy, and NHTSA should explore ways to accommodate this in CISS.

In summary, IIHS applauds NHTSA's efforts to maintain and expand this important tool for advancing highway safety and encourages the agency to consider these recommendations.

Sincerely,



Eric Teoh  
Director of Statistical Services