

August 10, 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; First Responder Incident Advanced Reporting Program; Agency/Docket Number: Docket No. NHTSA-2023-0024, Document Number: 2023-12420

Dear Acting Administrator Carlson:

On June 12, 2023, the National Highway Traffic Safety Administration (NHTSA) published in the Federal Register a Notice and request for comments on a new information collection. for which NHTSA intends to seek OMB approval on the First Responder Incident Advanced Reporting Program (FRIAR) in which first responders law enforcement, fire department, and emergency medical services) may submit information about fatalities, injuries, or crashes that may have been caused due to a motor vehicle or equipment defect. (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.

The Notice provides that the purpose of this collection is to provide first responders with a distinct mechanism to report to NHTSA's Office of Defects Investigation (ODI) regarding fatalities, injuries, or crashes that may have been caused due to an alleged defect. Currently, ODI collects Vehicle Owner Questionnaires (VOQ) to gather information from the public about alleged or suspected safety defects. The FRIAR collection is a separate method to collect safety and defect related information from the first responder community that will expedite and prioritize ODI's review of such reports.

The Notice further provides that the FRIAR program will differ from the agency VOQ review process because first responders, based on their experience, may identify an incident(s) or crash that involves a potential safety-related problem that warrants swift review by ODI. An ODI safety defect analyst or investigator will follow-up with the first responder within twenty-four business hours (or three business days) upon receipt of a report. Reports submitted to ODI, in combination with other information obtained by ODI, are analyzed to determine if a potential defect exists that may require further investigation or the initiation of a recall.

NAMIC supports this effort and applauds NHTSA for working on this critical problem. First responders have not had a direct or public method of reporting alleged safety defects to ODI, and the FRIAR program will address this reporting disparity.

Going forward, we suggest that NHTSA seek input from the insurance industry, who have experience and expertise that is 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 reporting. Additionally, insurers have existing relationships with many first responders and can amplify the value of the FRIAR program through those channels. 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. Thank you for your time and consideration.



Thomas J. Karol

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National Association of Mutual Insurance Companies