

October 3, 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; State Data Transfer for Vehicle Crash Information, Document Citation: 88 FR 60736, Agency/Docket Number: Docket No. NHTSA-2023-0019

Dear Acting Administrator Carlson:

On September 5, 2023, the National Highway Traffic Safety Administration (NHTSA) published in the Federal Register a Notice and request for comments on an extension with modification of a currently approved information collection (the Notice). This document describes a currently approved collection of information for which NHTSA intends to seek approval from the Office of Management and Budget for extension with modification on NHTSA's State Data Transfer (SDT) for Vehicle Crash Information. 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 NHTSA utilizes the SDT data to identify existing and emerging highway safety trends, assess the effectiveness of motor vehicle safety standards, and study the impact of new and emerging technologies on vehicles and highway safety programs. For example, NHTSA combines data from the SDT with information about the type of advanced driver assistance systems (ADAS) on crash-involved vehicles to estimate the effectiveness of ADAS technologies such as lane keeping support, automatic emergency braking, and blind spot detection. NHTSA also uses the SDT data to automatically pre-populate the motor vehicle crash data it collects for several other NHTSA data collection programs.

The Infrastructure Investment and Jobs under Section 24108 (d) authorizes the Secretary of Transportation to establish the State Electronic Data Collection (SEDC) program to provide grants to States to establish, upgrade, and standardize their centralized statewide crash data repositories to enable electronic data collection, intrastate data sharing, and electronic data transfer to NHTSA. The objective is to increase the accuracy, timeliness, and accessibility of the data, including data related to fatalities involving vulnerable road users. Through SEDC, NHTSA will award grants to States to modernize or establish a centralized statewide crash data repository to enable full electronic data transfer to NHTSA, increase their alignment to the Model Minimum Uniform Crash Criteria (MMUCC) Sixth Edition data, and transmit the data in a standardized format to NHTSA.

This information collection request is to modify NHTSA's existing information collection for SDT to account for changes resulting from the new grant program. The new grant program is expected to not only increase the number of States using the EDT protocol, but also encourage data standardization by states and increase alignment with the MMUCC. States awarded the SEDC grant will be referred to as SEDC States; States that continue to electronically transmit their crash data to NHTSA through the Electronic Data Transfer protocol without SEDC grant funds will be referred to as non-SEDC States.

NAMIC strongly supports this effort. There is no question that the proposed collection of additional information about crash data collected by the states is necessary for the proper performance of the functions of the agency, and that the information will have practical utility.

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. 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.

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