

November 16, 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; Request for Comment; Alcohol-Impaired Driving Segmentation Study: Docket No. NHTSA-2022-0077, Document Number: 2023-23076

Dear Acting Administrator Carlson:

On October 19, 2023, the National Highway Traffic Safety Administration (NHTSA) published in the Federal Register a Notice and request for comments on a request for approval of a new information collection (NPRM) seeking approval to conduct a one-time voluntary study to obtain information to better understand attitudes and behaviors related to alcohol-impaired driving that will be used to enhance and refine communication strategy and tactics. The study will survey drivers and motorcycle riders ages 21- to 54-years-old because this age range represents the greatest number of alcohol-related driving/riding fatalities according to NHTSA's Fatality Analysis Reporting System (FARS). 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 NPRM provides that the proposed research study will include two components, both being one-time collections. The first component will involve a series of online webcam interviews that will collect qualitative information that will serve as a cognitive test to improve the quantitative survey that will be administered in the second component. The quantitative survey will be administered online and by phone. After collecting the data, segmentation analysis will be done to classify drivers and motorcycle riders according to segments based on common demographics, drinking behaviors, attitudes about drinking and driving/motorcycle riding, and lifestyle characteristics. The NHTSA's Office of Communications and Consumer Information will use segmentation profiles to better target and reach intended audiences with communications messages and techniques that are relevant and meaningful to people within the target market.

The Notice states that a Federal Register Notice with a 60-day comment period soliciting comments on the information collection was published on June 7, 2023, and NAMIC was one of the two entities that provided comments at time. In our earlier comments, NAMIC made clear our support for federal efforts by and funding for NHTSA to help develop in-vehicle technology to prevent drunk driving. NAMIC also stands behind efforts at the state level by law enforcement and all aligned stakeholders to reduce drunk-driving fatalities and injuries.

Going forward, we suggested 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 noted that we would be most interested in working with NHTSA on these areas.

In the present NPRM, NHTSA states that it looks forward to completing this study, sharing the results, and having discussions with NAMIC on how we can work together to decrease impaired-driving crashes, injuries, and fatalities in the U.S. We greatly appreciate this commitment.

NHTSA has not provided additional avenues or opportunities for discussion on this particular NPRM, but we would like to take this opportunity to support the proposed one-time voluntary study to obtain information to better understand attitudes and behaviors related to alcohol-impaired driving that will be used to enhance and refine communication strategy and tactics. At the same time, we believe that to be truly effective NHTSA should consider more comprehensive and inclusive efforts in the future. We would have appreciated the opportunity to provide additional input prior to the NPRM, as well as the inclusion of our insurance company members and other organizations interested in and working on this genuine problem.

Numerous NAMIC member companies are engaged in partnerships with organizations like Mothers Against Drunk Driving and Students Against Drunk Driving whose focus is on the study and prevention of drunk and drugged driving. Similarly, insurers participate in substantial efforts to study and combat drunk driving through research partnerships with universities and through their own charitable foundations. We also believe that additional NHTSA outreach to our partners at Advocates for Highway and Auto Safety, the Governors Highway Safety Association, the Insurance Institute for Highway Safety, and potential collaboration with other Federal Agencies that study these issues like the NIH will provide valuable insights to NHTSA on the design and operation of this and additional future studies.

In our comments to NHTSA over the years, NAMIC has suggested that NHTSA better leverage the substantial knowledge on safety that NAMIC and our many auto insurance companies can offer. In addition to the gracious NHTSA offer to share results and have discussions with NAMIC on how we can work together in the future, we again suggest that the goals of NHTSA can be advanced by taking more and better advantage of our resources in the planning stage of studies and other programs. We also believe that complete transparency regarding the study results should be made publicly available rather than summary data or findings.

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

General Counsel – Federal
National Association of Mutual Insurance Companies