

July 11, 2024

Ms. Sophie Shulman
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;
National Traffic Safety Survey, Agency/Docket Number: Docket No. NHTSA-NHTSA-
2023-0062, Document Number:2024-10851**

Dear Acting Administrator Shulman:

On May 17, 2024, 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 collection of information and invited public comments about a proposed collection of information to better understand the public's behavior and attitudes regarding traffic safety issues including seat belts, distracted driving, new and emerging vehicle technologies, and traffic safety and enforcement. 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 almost 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.

NHTSA has conducted seven previous iterations of the Motor Vehicle Occupant Safety Survey (MVOSS) to ascertain critical information on driver and passenger attitudes and behaviors related to safety; most recently in 2016. NHTSA states that recent advances in vehicle safety technologies, increases in portable electronic device use, and changes in attitudes towards enforcement have all changed the driving environment, and there is a need to collect up-to-date information about the public's attitudes and behavior on these traffic safety topics to better inform programs aimed at improving the safety of all road users.


The Notice states that the proposed data collection is the “next generation” of NHTSA's previous MVOSS, expanded across more traffic safety topics to increase relevance to current and future traffic safety issues. The new data collection is intended to deliver highly relevant, actionable data on current and future topics in traffic safety that support the agency's mission to save lives, prevent injuries, and reduce economic costs resulting from traffic crashes.

NHTSA proposes to produce a technical report that presents the results of the survey, as well as a publicly available dataset, including aggregate (summary) statistics and tables as well as the results of statistical analysis of the information. The technical report will be shared with State highway safety offices, local governments, policymakers, researchers, educators, advocates, and others who may use the data from this survey to support their work.

NAMIC supports this effort by NHTSA. There is no question that the proposed collection of information is necessary for the proper performance of the functions of the agency, and that the information will have practical utility.

Going forward, we strongly encourage NHTSA to continue to seek input from the more representatives of 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.



Thomas J. Karol

General Counsel – Federal
National Association of Mutual Insurance Companies

