

November 18, 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;  
Reporting of Information and Documents About Potential Defects, Docket No.  
NHTSA-2024-0055, OMB Control:2127-0616.**

Dear Acting Administrator Shulman:

On September 20, 2024, the National Highway Traffic Safety Administration (NHTSA) published in the Federal Register a Notice and request for comments on an extension without change of a currently approved collection of information. which would extend without change a currently approved collection of information, OMB No. 2127-0616, covering requirements in 49 CFR 579, Reporting of Information and Communications about Potential Defects. 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.

This collection request covers the requirements found in part 579 subpart A, § 579.5, which requires manufacturers to furnish notices of defects or failures in its vehicles, as well as consumer advisory, recall, or other safety activity involving the repair or replacement of motor vehicles or equipment, that the manufacturer issued. Manufacturers are required to submit these documents monthly, and NHTSA estimates that it receives approximately 17,615 notices a year. This information collection request also covers the requirements found in part 579 subpart B, “Reporting of Safety Recalls and Other Safety Campaigns in Foreign Countries” and the requirements found in part 579 subpart C, “Reporting of Early Warning Information.”

NAMIC strongly 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. We believe that the results of the information collection will help NHTSA better understand and ensure vehicle safety.

The purpose of part 579 is to enhance motor vehicle safety by specifying information and documents that manufacturers of motor vehicles and motor vehicle equipment must provide to NHTSA concerning possible safety-related defects and non-compliances in their products, including the reporting of safety recalls and other safety campaigns the manufacturers conduct outside the United States.

The information required under 49 U.S.C. 30166 and 49 CFR part 579 is necessary for NHTSA to promptly identify potential safety-related defects in motor vehicles and motor vehicle equipment in the United States. When a trend in incidents arising from a potentially safety-related defect is discovered, NHTSA can use this information, along with other agency data, to determine whether to open a defect investigation. The Early Warning Reporting requirements for claims or notices for incidents involving death or injury; numbers of property damage claims, consumer complaints, warranty claims, and field reports; copies of field reports; and other information is critical for NHTSA to identify potential safety-related defects.

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](mailto:tkarol@namic.org).  
Thank you for your time and consideration.



Thomas J. Karol

General Counsel – Federal  
National Association of Mutual Insurance Companies