

December 3, 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;
Limousine Crashworthiness Safety Research, Docket No. NHTSA-2024-0054**

Dear Acting Administrator Shulman:

On October 7, 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 (the Notice) seeking approval for a new information collection request. 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.

The Notice proposes a research approach that will consist of one-time voluntary interviews of three groups related to the limousine market: (a) Vehicle Original Equipment Manufacturer [OEM], (b) OEM program participant, and (c) OEM program nonparticipants. The interviews will consist of approximately 10-15 open-ended questions about limousine fabrication intended for reporting on safety characteristics related to evacuation, crashworthiness, occupant seating, and restraints. Three versions of the interview will be used, one for each category of manufacturer.

Interview results will be collected and summarized in a final report available for public consumption and the data will help provide NHTSA with data required for necessary cost-benefit analyses prior to potential rulemaking activities. This information collection is intended to aid in any cost-benefit analyses that would be required for promulgating new federal safety regulation and other regulatory alternative considerations.

NAMIC supports this effort and the intended safety goal. The proposed collection of information seems reasonably necessary to assist in safety determinations and to 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