

January 12, 2025

Cem Hatipoglu
Associate Administrator, Vehicle Safety Research.
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Agency Information Collection Activities; Notice and Request for Comment; Crash Avoidance Warning System Human-Machine Interface (HMI) Research, Docket No. NHTSA- -2024-0070.

Dear Associate Administrator Hatipoglu::

On November 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 information collection inviting public comments on a request approval from the Office of Management and Budget for a new information collection. 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 information collection will conduct six new voluntary information collections as part of a one-time research study of drivers' interactions with crash avoidance technology with HMI characteristics. NHTSA is seeking to conduct the research effort involving up to 200 licensed drivers without assisted devices between the ages of 25 to 65 from the greater Columbus, Ohio area. The collection of information will consist of (1) Interest Response Form to be administered up to 750 potential research participants, (2) Candidate Screening Questions to be administered up to 375 potential research participants, (3) Appointment Scheduling, (4) Participant Informed Consent Form to be administered to up to 200 research participants, (5) Study Data Collection, and (6) Post-Drive Questionnaire.

The objective of this driving research is to examine driver behavior in using crash avoidance warning systems and assess effects of human-machine interface characteristics on drivers' behavior and driver response in crash-imminent scenarios. The research will involve driver behavior observation while driving on a test track, public roads, or in a simulated environment (*i.e.*, driving simulator). Data collection may also involve stationary laboratory measurements relating to crash avoidance warning signal characteristics, such as stationary laboratory measurements of individuals' visual angles when gazing at in-vehicle visual signals (*e.g.*, instrument panel symbols) and displays. Test vehicles will be equipped, as needed, with instrumentation for recording driver eye glance behavior, vehicle control inputs (steering wheel, accelerator pedal, and brake pedal inputs), vehicle position and speed, and turn signal status.

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.

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. 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