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Comment from Jocelyn Crowell

Posted by the **National Highway Traffic Safety Administration** on May 7, 2025

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The National Highway Traffic Safety Administration (NHTSA) is seeking to increase the number of sites crash data is collected from and to increase the types of crashes investigated to include non-motorists, motorcycles, and large trucks. It is a much-needed expansion of NHTSA's investigatory authority, which will enhance available crash data that is critical to designing effective countermeasures. This expansion of data collection does not have any new startup or maintenance costs, and costs are limited to cost of work hours. Data collection is the backbone of effective countermeasures, and this is an important step in increasing the safety of American roads, for motorists and pedestrians alike.

According to a Morbidity and Mortality analysis, the United States is not decreasing traffic-related deaths at the same rate as other high-income countries; in fact, fatalities have substantially increased in recent years. Pedestrian deaths increased 50% in the 2013 to 2022 period, highest among other high-income countries. US traffic-related fatalities are out of place among peer countries, and an increase in NHTSA's data collection is an effective step in addressing this issue. These studies have been attached to this comment, or can be found at <http://dx.doi.org/10.15585/mmwr.mm7408a2> and <http://dx.doi.org/10.15585/mmwr.mm7126a1>.

Put simply, there is no way to adequately address America's traffic safety issues without a clear understanding of where those issues lie. A broadening of investigations to include non-motorists (among other key groups) is important in addressing the rise in pedestrian deaths. An increase in crash sites investigated will also give NHTSA a greater sample that is more representative of crash trends and more relevant to potential policy actions to mitigate harm. This data is critical to developing effective traffic safety policies at all levels of government. NHTSA's proposed expansion of data collection should be approved, as it is necessary for NHTSA's work and has a high utility for policymakers in addressing traffic safety. This action should be adopted in the interest of public safety.

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Attachments

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Attachment1_Motor Vehicle Crash Deaths



Download (https://downloads.regulations.gov/NHTSA-2025-0025-0003/attachment_1.pdf)



Attachment2_Pedestrian and Road Traffic Crash Deaths



Download (https://downloads.regulations.gov/NHTSA-2025-0025-0003/attachment_2.pdf)

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