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Comment from Insurance Institute for Highway Safety

Posted by the **National Highway Traffic Safety Administration** on Jan 22, 2025

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Comment


Dear Associate Administrator Srinivasan:

The Insurance Institute for Highway Safety welcomes the opportunity to comment on the proposed information collection "National Roadside Survey of Alcohol and Drug Prevalence of Road Users: 2025." Please see the attached document for the full text of our comment.

Sincerely,
Angela H. Eichelberger, Ph.D.
Senior Research Scientist

Attachments 1

 IIHS Comment

 Download (https://downloads.regulations.gov/NHTSA-2024-0004-0007/attachment_1.pdf)

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January 21, 2025

Nanda Narayanan Srinivasan
Associate Administrator, Research and Program Development
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Request for public comment on proposed new collection of information
Docket No. NHTSA-2024-0004

Dear Associate Administrator Srinivasan:

The Insurance Institute for Highway Safety (IIHS) welcomes the opportunity to comment on the proposed information collection "National Roadside Survey of Alcohol and Drug Prevalence of Road Users: 2025." As described in the *Federal Register* notice of November 20, 2024, NHTSA proposes to collect anonymous data on alcohol and drug prevalence among drivers and other road users who voluntarily participate in the survey.

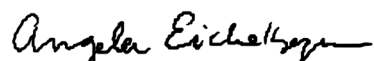
Since 1973, national roadside surveys have provided nationally representative estimates of alcohol prevalence among drivers. This information has been useful for tracking progress in addressing alcohol impairment among drivers over time, and the information has been used in conjunction with other data sets to estimate the crash risk associated with various blood alcohol levels (e.g., Voas et al., 2012). In 2007, information on drug prevalence was added to the survey for the first time (Lacey et al., 2009). The 2007 and 2013–2014 surveys provide the only nationally representative estimates of drug prevalence among drivers for potentially impairing drugs other than alcohol.

Given that it has been more than a decade since the last national roadside survey was conducted, IIHS believes a 2025 survey is important for providing up-to-date alcohol and drug prevalence estimates among drivers. NHTSA's proposal to collect breath and oral fluid samples at roadside from drivers who voluntarily participate is consistent with the methodology of prior surveys and will be important to ensure that prevalence estimates are comparable across survey years.

IIHS agrees that other road users such as pedestrians, bicyclists, and electric scooter riders will be a useful addition to the survey, as the number of non-occupant fatalities on U.S. roadways has been increasing in recent years. This information may be useful for identifying the extent to which impairment may be a contributing factor to injuries in this population.

In conclusion, IIHS supports the collection of information to examine alcohol and drug prevalence among drivers and other road users, and we appreciate the opportunity to comment on this matter.

Sincerely,



Angela H. Eichelberger, Ph.D.
Senior Research Scientist
Insurance Institute for Highway Safety

References

- Lacey, J. H., Kelley-Baker, T., Furr-Holden, D., Voas, R. B., Romano, E., Ramirez, A., Brainard, K., Moore, C., Torres, P., & Berning, A. (2009). *2007 National Roadside Survey of alcohol and drug use by drivers* (Report No. DOT HS 811 249). U.S. Department of Transportation, National Highway Traffic Safety Administration.
<https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/811249.pdf>
- Voas, R. B., Torres, P., Romano, E., & Lacey, J. H. (2012). Alcohol-related risk of driver fatalities: An update using 2007 data. *Journal of Studies on Alcohol and Drugs*, 73(3), 341–350.
<https://doi.org/10.15288/jsad.2012.73.341>