



March 3, 2025

Mr. Peter Simshauser
Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

RE: Agency Information Collection Activities; Notice and Request for Comment; Vehicle Information for the General Public; Docket No. NHTSA-2024-0017.

Dear Mr. Simshauser,

The Alliance for Automotive Innovation (Auto Innovators) appreciates the opportunity to provide comments in response to the December 31, 2024, notice and request for comments on a revision of a previously approved collection of information in support of the dissemination of vehicle safety information through the New Car Assessment Program ("NCAP") and corresponding www.nhtsa.gov website.^{1,2}

NCAP has the capacity to be a valuable resource to drive safety improvement for road users. Done well, NCAP can improve consumer's understanding of the relative safety performance of vehicles in the marketplace and provide additional information on the latest safety features and technologies available today. The auto industry continues to make significant investments in the development of advanced restraint systems, crash avoidance features, and other innovative driver support features. NCAP must keep up to be relevant and can play a role in ensuring awareness and adoption of new technologies that can help address the number of injuries and fatalities that occur on our roads each year. However, we are concerned about the expanded scope of this NCAP information request, the utility of the information being requested, and the estimated 450% increase in estimated burden.

We support the goals of NCAP and other vehicle ratings programs in ensuring relevant information is made available to consumers, however, NCAP must balance the burden imposed on manufacturers with the benefit that accrues to consumers. To that end, the proposed expansion of the data collection requires additional justification and details. Additional data may not provide additional utility and could have a negative effect if the volume of information is overwhelming such that consumers cannot derive benefits from it. The goal of NCAP is not to recreate a list of information that is already available on manufacturer websites. Rather, it is to help consumers understand complex data about vehicles when making a purchasing or leasing decision. NHTSA should publish more details on the specific data

¹ Auto Innovators represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing approximately 5 percent of the country's GDP, responsible for supporting nearly 10 million jobs, and driving \$1 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.

² 89 FR 107192

elements that it is considering adding to this information collection request, including the expected benefits and justification for adding each new data element, and how these data will be communicated to consumers. In addition, the agency should also consider whether some of the current reporting elements are still relevant or could be removed to reduce burden concerns.

We ask that NHTSA address these concerns prior to seeking approval from the Office of Management and Budget (OMB) on this modified information collection.

Comments on whether the proposed collection of information is necessary for the Department's performance

Auto Innovators anticipates that an increase in reporting is likely needed to support the expanded crash avoidance and pedestrian protection evaluations, particularly given the agency's reliance on manufacturers' self-reported data and the need for OEMs to verify this information prior to submission. However, due to the lack of information in support of this information collection request, it is unclear whether all aspects of the proposal are necessary for meeting the goals of the program. We have significant concerns about the scope, burden, and utility of all of the information that is requested. As noted in the *Federal Register*, the primary purpose is to provide information to consumers and disseminate vehicle safety information on NHTSA's website. However, only a small percentage of the information requested appears on the agency's consumer-facing website when viewing or comparing different make and model vehicles.³

In recent years, the auto industry has expressed concerns about the increasing burden of this request, and we ask that the agency reconsider whether there is an ongoing need to collect certain data, particularly as the agency seeks to expand this collection further to require more information about crash avoidance technologies and vulnerable road user safety.^{4,5}

While we recognize that Section 24213(b) of the Infrastructure Investment and Jobs Act (IIJA) includes additional information requirements, it should not be used as justification for collecting data that does not meet the primary objectives of the program.

Comments on the accuracy of the estimated burden.

The proposed increase in burden is substantial. We believe the actual burden will far exceed the 450% increase estimated by the agency. As this information collection has expanded, NHTSA has significantly underestimated the reporting burden associated with this request on a consistent basis. At present, the request letter in support of this information request is currently 37 pages long for each vehicle make and model. Completing the form requires manufacturers to supply extensive amounts of information. This can range between high-level information on the vehicle class, to more specific technical data on crashworthiness and Advanced Driver Assistance System (ADAS) test results. This information is currently collected and maintained using Microsoft Excel spreadsheets, with a total of 588 total columns (or individual data points) required for each vehicle make and model reported. As a result, the development of these reports becomes an extensive undertaking in terms of the volume of data that must be provided. For example, if a manufacturer has a fleet of 30 vehicles, the submission will require a total of 17,640 data points that must be coded and verified for accuracy.

³ New Car Assessment Program Homepage: <https://www.nhtsa.gov/ratings>

⁴ Auto Innovators Comments in response to the 2021 Agency Information Collection Activities; Notice and Request for Comments on Vehicle Information for the General Public – See Docket No: [NHTSA-2019-0113-0004](https://www.dhs.gov/2021/01/13/2021-0113-0004)

⁵ <https://www.federalregister.gov/d/2024-31362/p-20>

While NHTSA acknowledges a separate information request related to the submission of data for self-certification for motor vehicle compliance, the consumer information reporting subject to this approval request already exceeds the burden required for reporting on all FMVSS combined. In addition, not all of this information is provided to consumers. For example, 220 columns of data are required for ADAS checkmarks to appear on the website. A further 265 data points are required to achieve a “Meets Side Airbag Out-of-Position” checkmark on the agency website, which is provided as a simple “yes” or “no” with no context or additional information for why this information may be relevant to the consumer (see Figure 1). As a result, we see opportunity to streamline this information collection activity.

Air Bags	
Frontal Air Bag	Driver, Front Passenger
Head Protection	Driver, Front Passenger, 2nd row, 3rd row
Torso and/or Pelvis Protection	Driver, Front Passenger
Knee	Driver, Front Passenger
Additional Air Bags	None
Meets Side Air Bag Out-of-Position	Yes
Requirements	

Figure 1: Example of NCAP safety features information on airbags

Overall, In reality, the time spent on developing and maintaining each report usually exceeds the 15 hours per vehicle that NHTSA currently estimates. There is typically no one system within any organization that includes all of the information covered in the data collection request, and this often requires that data be sourced, formatted, and verified across multiple departments and databases to help ensure accuracy and completeness – which can be challenging if additional content approval and validation of certain technical information is required. Given that some of the requested data is considered Confidential Business Information (CBI), additional legal review may also be required to ensure that sensitive information is appropriately protected. All of these factors increase the actual burden of reporting.

We also disagree with the agency’s assessment that the burden of reporting is “further reduced by sending electronic files to the respondents so that they can enter the data and return it to the agency electronically.” The current spreadsheet templates are cumbersome to use, and as a result data collection can be prone to error given the substantial levels of coordination that must take place within each company to complete the information request. This increases not only the time taken to enter data, but also verify and correct data where inconsistencies arise. In addition, NHTSA may make formatting changes to templates from one model year to the next without an assessment of whether those changes increase or reduce the data collection burden for companies. And while we recognize there are planned efforts to modernize its reporting infrastructure, it is unlikely that this will result in any meaningful burden reductions without first addressing the number of data elements being requested. If not yet considered, NHTSA should also provide information on how the proposed reporting burden estimates are expected to be impacted by these future IT infrastructure changes. Without careful consideration and input from manufacturers, we have concerns that the overall burden, in terms of hours required to input and verify information, could increase further.

Comments on ways for the Department to enhance the quality, utility, and clarity of the information collection and how the burden could be minimized without reducing the quality of the collected information.

NHTSA should conduct a comprehensive review of both current and proposed reporting elements to identify opportunities to minimize the overall burden of reporting based on whether the information provides benefits to consumers. Requiring more data does not necessarily enhance the quality of the program. This information collection is a burdensome process that appears to have limited utility given the gap between the information that is reported to NHTSA, and what is actually communicated to consumers.

As a general matter, efforts to address the burden of reporting should be an ongoing process with continued public dialogue. We reiterate our previous comments to the agency, and emphasize that in order to help enhance the quality of reporting and minimize overall burden, NHTSA should engage with industry on a more regular basis including scheduling meetings for two-way, constructive feedback and communication. We ask that NHTSA reconsider our request in response to this submission.⁶

Conclusion

Auto Innovators could be supportive of this information collection activity, however, more needs to be done to balance the overall burden with the benefits of collecting additional information, and whether it provides meaningful information to consumers on the safety performance of vehicles. The agency has not provided enough information for us to provide comments on the substantive aspects of this information request. We ask that NHTSA please make this information available for comment prior to seeking approval from the Office of Management and Budget (OMB) on this request.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'SP' followed by a horizontal line.

Sarah Puro
Vice President, Safety and Technology Policy
Alliance for Automotive Innovation

⁶ As noted in Auto Innovators response to the November 12, 2021, NHTSA consumer information approval request: "To help enhance the quality of reporting and minimize overall burden, we request that NHTSA host two stakeholder meetings per year. The first proposed meeting would be to discuss planned updates to the program prior to any changes being finalized. This would provide an opportunity for the agency to provide additional background on the rationale for requesting any new data elements, and to identify suggestions for improving the overall data collection process (both for existing and new elements). The second proposed meeting would be similar to prior annual briefings where the agency would review the final changes to the submission requirements and address any outstanding questions. Providing these opportunities for additional dialogue will help ensure that more robust processes are in place and inform more accurate burden estimates moving forward." (NHTSA-2019-0113-0003)