



March 11, 2025

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

RE: Supplemental notice of proposed rulemaking (SNPRM); Updated Means of Providing Recall Notification [NHTSA-2016-0001]

Dear Mr. Simshauser,

The Alliance for Automotive Innovation (Auto Innovators) appreciates the opportunity to provide comments in response to the January 10, 2025, Supplemental Notice of Proposed Rulemaking on Updated Means of Providing Recall Notification.^{1,2} Primarily, the proposal would add recall notification by electronic means, in addition to first class mail. OEMs have demonstrated that they are fully committed to achieving a common goal of increasing overall recall completions. Unfortunately, however, we cannot support the SNPRM as proposed, as the requirements would impose subjective and highly burdensome requirements that could constrain OEMs in their ability to implement effective recall campaigns. There is typically no “one size fits all” approach to recalls, and the effectiveness of applying different approaches can vary based on the unique circumstances of a given recall campaign. We encourage further dialogue with industry stakeholders to understand the challenges in leveraging electronic communications to increase recall completion.

Executive Summary

Auto Innovators members have been proactive in efforts to improve consumer access to information on the recall status of their vehicles. In fact, the automotive industry has partnered with new and diverse stakeholders to help advance increased recall awareness beyond direct manufacturer communications. In 2018, our members established the Vehicle Recall Search Service (or VRSS) in partnership with CARFAX to enable public and private sector entities to automatically check thousands of vehicles simultaneously to help notify owners of potential open recalls at no charge to end users. To date, organizations such as insurance companies, rental car fleets, business fleet managers, ride sharing programs, federal and state government agencies – including Departments of Motor Vehicles, automotive parts recyclers, and finance companies have successfully used VRSS to notify their customers. Since its launch, approximately 8 billion additional recall checks have been performed, covering almost half of vehicles on the road.

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 [90 FR 1909](#)

Electronic communications can play an important role in helping increase recall awareness. Manufacturers continue to identify and explore new ways for connecting with consumers. Our outreach includes leveraging approaches similar to those referenced in the SNPRM, such as email, over-the-air communications, and use of social media. OEMs will continue to support and use these methods under the right circumstances. However, the SNPRM goes too far in proposing to mandate various types of electronic communications that have not been appropriately considered for their utility and burden.

It is critical that OEMs have flexibility to leverage innovative solutions for identifying and notifying consumers based on the unique circumstances encountered during any given recall campaign. At present, manufacturers can tailor the electronic notification to the audience and maximize the improved response rates of the specific format of an electronic notification. However, the SNPRM removes some of these critical flexibilities, and could have the unintended consequence of hindering recall completion rates.

Auto Innovators has six main concerns with the proposal:

1. **Requiring dual notices is inconsistent with Congressional intent.** The proposal to require both written and electronic communications in all circumstances is based on an incorrect interpretation of the FAST Act. As proposed, the SNPRM would also expand NHTSA authority to require additional electronic notifications without any analysis of the efficacy of doing so. As noted in the industry response to the NPRM, the statute permits electronic notification in addition to first class mail but does not require both forms for every recall.³
2. **The proposed rule will impose substantial burden with unclear benefits.** The agency asserts that the rule would not impose significant burdens on manufacturers and, therefore, does not require a full cost-benefit evaluation.⁴ We disagree. Prior to issuing any final rule on this rulemaking proceeding, NHTSA should have published a Preliminary Regulatory Impact Analysis (PRIA) to justify its proposals as the efficacy of the proposed requirements have not been clearly stated. In addition, the agency should also have considered the need for exemptions for small volume manufacturers (SVMs) based on the relative burden associated with the proposed requirements given a smaller target population of affected vehicles.
3. **The proposed two-tier approach for recall notifications is not objectively defined and establishes de facto requirements.** We oppose the agency establishing the proposed requirements for second-tier notifications. There has never been a comprehensive or centralized source for electronic contact information. Consumers use a multitude of digital platforms. Their contact information, even if it exists, is difficult to verify, and its use is also often transient. As a result, it is unreasonable for the agency to assume that it is possible to contact every affected vehicle owner by electronic means or know which owners have been reached through direct communications. The proposal creates a de facto requirement that manufacturers conduct second-tier communications, which includes broadcast notifications such as television, radio, or social media. Even if manufacturers were to have accurate contact information for 95% of owners, these types of communication would still be required, creating a substantial regulatory burden without associated benefits.

³ <https://www.regulations.gov/comment/NHTSA-2016-0001-0024>

⁴ <https://www.federalregister.gov/d/2024-31011/p-133>

4. **The requirements for supplemental notifications create significant regulatory uncertainty.** In the proposed rule, NHTSA did not include any objective measures for when it will require supplemental recall notifications or how to determine if a chosen communication approach is “reasonably likely” to reach each affected owner. There are limited benefits of repeat recall notifications over time, as well as risks of message dilution when saturating consumers with recall notifications through multiple channels. We are opposed to NHTSA requiring indefinite notifications without any qualifications for when supplemental notifications may be required.
5. **The proposed rule constrains manufacturers’ ability to effectively reach consumers by requiring a 5-year plan.** The proposal to require manufacturers to develop and maintain a five-year recall notification plan constrains manufacturers in their ability to adapt quickly to changes based on the unique circumstances encountered during a given recall campaign. Furthermore, NHTSA is undermining efforts to create a more flexible, innovative, and nimble approach to recall notification by requiring that manufacturers develop and update their five-year recall notification plan 10 business days in advance of using any new means of electronic communication that was not previously stated in the plan. This proposal is also not consistent with the 5-day review time period for providing the written notice. As a result, we do not support a requirement to maintain a five-year plan. Manufacturers already have established processes in place, and it is important that they have continued flexibility to modify their approaches to adapt to the unique circumstances of any given recall campaign.
6. **The rule fails to consider limitations with the existing recall framework in the U.S.** Absent structural changes in how recalls are managed (e.g. improved sources of reliable vehicle owner information), meaningful increases in recall completion rates will not occur. Working toward this goal requires a more holistic approach, including engagement from federal and state policymakers to ensure that the necessary policy frameworks are in place to enable future success. We also encourage NHTSA to work with state policymakers to enhance state data systems to ensure up-to-date and consistent vehicle owner and/or registration information is collected and maintained.

Detailed Comments

1. Requiring dual notices is inconsistent with Congressional intent.

NHTSA proposes to require that manufacturers issue both electronic and first-class mail notifications for every recall. It is also modifying the initial NPRM proposal to include a two-tiered approach for targeting recipients of the notification.

We disagree with the agency’s interpretation that the FAST Act requires electronic notification for all recall notifications. NHTSA states that the “supplemental proposed rule requires recall notification by both electronic means and first-class mail for every recall, but not necessarily for every instance of notification for that recall.” A requirement that electronic notifications reach all affected customers is unattainable. This is exacerbated if manufacturers are required to leverage all means that are “reasonably likely to reach each affected owner and purchaser” when issuing notifications by electronic means. As noted in our response to the NPRM, the statute permits electronic notification in addition to first class mail but does not require both forms for every recall.⁵

⁵ <https://www.regulations.gov/comment/NHTSA-2016-0001-0024>

2. The proposed rule will impose substantial burden with unclear benefits.

Building on the lack of objective data, we have significant concerns that the proposed rule will result in substantial costs with unknown safety benefits. The assumption that simply requiring more recall notifications will result in substantially higher recall completion rates is not supported by data, and the rule has the potential to impose significant costs without any meaningful benefits – especially if the underlying challenges associated with up-to-date contact information (for both first-class mail and electronic notifications) are not addressed. In fact, the proposal could have the unintended consequence of saturating consumers with recall notifications through multiple channels and hindering recall rates. More specifically, there are no reliable methods for determining whether notifications reach their intended recipients or, in the case of electronic notifications, whether the owner opens the notice. The challenge is even greater for broadcast notification (e.g., television, radio), which are both high cost and largely dependent upon whether or not the intended audience is tuning in.

The agency has not provided a Preliminary Regulatory Impact Analysis to support rulemaking.

NHTSA has not provided any estimates of the regulatory impact or burden associated with the implementation of the proposed rule. Although the agency has attempted to quantify the paperwork burden associated with this rule, such an estimate does not address the substantial cost of conducting recall campaigns consistent with the new requirements.

Indeed, there are several fundamental flaws in the agency's underlying assumptions regarding the regulatory burden of the proposed rule. For example, it is unreasonable to assume that email, over-the-air communications, and use of social-media accounts are largely “free of charge” when used for large-scale communications campaigns.⁶ Manufacturers may have some email contact information for newer owners, but the ability to obtain missing contact information may be limited (i.e., even when companies pay third parties to source information, it may not be possible to obtain email addresses that are not otherwise publicly available). The agency also underestimates the staffing and resource burdens in both developing both long-term and recall specific notification plans, nor do they address the additional risks associated with safely protecting these communications from being exploited by bad actors and the resource burdens associated with implementing effective countermeasures. These issues were also discussed at length in the industry response to the NPRM as outlined below.⁷

Even for internet-based electronic communications such as text messaging and emails, manufacturers will incur substantial costs for acquiring contact information for customers (such as email lists, text message directories, etc.). As electronic addresses change frequently, manufacturers will likely incur those costs again if a second (or further) notification is required. Additionally, manufacturers typically pay vendors to handle the preparation and distribution of electronic messages, and those costs are not “free of charge.” While the total costs will depend on the size of the recall (and therefore the number of messages to be sent out, if that form of electronic notification is selected), NHTSA should make some effort to identify and understand these costs, and to evaluate whether the burden may be different in the various sectors who conduct safety recalls: light duty vehicle manufacturers, heavy vehicle manufacturers, child restraint manufacturers, tire manufacturers, and equipment manufacturers. In addition, to the extent the electronic notification is made through text messaging or similar communications media, there may be costs imposed on the individual receiving the message, depending upon the

⁶ <https://www.federalregister.gov/d/2024-31011/p-154>

⁷ Comments by the Auto Alliance and Global Automakers in response to the September 1, 2016, NPRM [NHTSA-2016-0001-0024 and 2016-0001-0028]

wireless data plan in use. NHTSA should also make some effort to identify and understand these costs on consumers.

All of these concerns are still relevant and should have been considered as part of the agency's regulatory impact analysis. For example, we anticipate that due to the increased burden, OEMs will have to leverage additional vendors to develop content, place advertisements, and support both direct and indirect communication outreach efforts, all of which adds additional burden without evidence that it will improve recall completion rates. In addition, the agency's regulatory impact analysis should also have more comprehensively considered the relative cost implication for small volume manufacturers and the need for potential exemptions for SVMs, as most of the second-tier communications means listed in the NPRM (i.e., social media or online campaigns, radio and television notifications) are not feasible due to high costs and the relatively small number of affected customers.

NHTSA should have published a Preliminary Regulatory Impact Analysis (PRIA) to justify its proposals.

3. The proposed two-tier approach for recall notifications is not objectively defined and establishes de facto requirements.

The SNPRM fails to recognize the challenges that manufacturers encounter when seeking to increase recall completion rates (e.g., maintaining up-to-date contact information and consumers initiating repairs on their vehicle). Instead, the SNPRM seeks to overcompensate for these issues by requiring additional targeted and non-targeted communications to consumers. These approaches may have limited effectiveness and there is no way of accurately assessing whether a given notification will reach its intended target audience.

NHTSA has proposed a two-tiered approach that would first require that manufacturers use "all reasonable efforts" to issue electronic recall notifications through contact information specific to each individual owner and purchaser. Second-tier notifications are required when individual owners, purchasers, and lessees cannot be notified through direct communications; it essentially requires that manufacturers utilize broad-based communications campaigns on television, radio, and targeted social media. The proposed rule also provides the Administrator with discretion to require other means of notification based on the agency's assessment of whether the chosen means is deemed "impractical" or "inappropriate" for reaching all affected owners.⁸ This is a significant departure from current practice and creates significant uncertainty for automakers about what they will be required to do under the subjective regulatory standard. There are several reasons for this:

First, the term "all reasonable efforts" is not defined. Manufacturers have no way to know how the subjective requirements will be interpreted by NHTSA from a compliance perspective. In addition, as noted in the previous industry response to the NPRM, there is no email list, text message directory, or social media platform that can be used to obtain contact information for each individual owner or vehicle purchaser. Ensuring availability and access to up-to-date contact information becomes increasingly challenging, particularly due to increased *channel fragmentation* where customers use diverse communication platforms and technologies, or otherwise limit their content preferences (e.g., opt out of emails). In addition, the agency's proposal does not consider the impact of consumer privacy and the extent to which vehicle owners may opt out of receiving certain notifications. The agency has also not considered the extent to which over-the-air updates may be used as a primary means of electronic communication. Given the ever-evolving communications landscape, and the aforementioned

⁸ 90 FR. 1909 at 1922

lack of a PRIA on the effectiveness of certain types of electronic communications reaching consumers, there is little to no clear context for what constitutes a "reasonable" approach.

The agency states that it “believes that for every recall there will exist either a notification by electronic means, or a combination of such means, that is reasonably calculated to reach each affected owner and purchasers.”⁹ We disagree; it is not reasonable for the agency to conclude that manufacturers have access to up-to-date information on what these means are, and the extent to which they can be effectively utilized to contact each and every individual vehicle owner. As the agency is aware, it is already challenging for manufacturers to obtain up to date, name, and address information from vehicle state registration records (which are required in each state). In addition to challenges with up to date address information, there are also a substantial number of VINs that have incorrect owner names. The level of complexity and difficulty in contacting owners also increases over time due to changes in vehicle ownership.

Second, because it is unlikely that every affected owner and purchaser can be reached through direct notification (e.g., because relevant contact information is unavailable or inconsistently provided by the owner), it stands to reason that second-tier notifications may become a de facto requirement. In other words, without clear first-tier notification requirements, manufacturers must also send additional electronic notifications “reasonably calculated” to reach owners that are unreachable through primary means. Absent clarity to the contrary, the requirement removes any argument that the proposed tier structure provides regulatory relief. Instead, it leaves discretion to NHTSA on whether first- and second-tier communications meet the undefined reasonableness threshold and there is no objective data to make such a determination.

As proposed, second-tier communications include more general forms of broadcast notification, such as radio or social media campaigns. Requiring these types of communication for all recall campaigns may have an unintended consequence of further desensitizing consumers to non-targeted information and creating “recall fatigue” where vehicle owners become less responsive to recall notifications over time. Particularly as consumers must filter, and most importantly, act on recall information that may be applicable to their vehicle. For example, if there were 1,000 recalls in a given year, this would result in an average of approximately 3 broadcasts every day, assuming that OEMs do not have direct contact information for every owner (which is the case for the vast majority of recalls). Because this broadcast information would not be relevant for most people, such frequent messages would likely be tuned out and this also risks desensitizing consumers when attempting to communicate increased urgency for certain recalls. Furthermore, there are no guarantees that even with persistent broadcast communications that messages will reach their intended target audience. This is particularly challenging for smaller recalls (e.g., fewer than 1,000 vehicles) where manufacturers would be required to issue broadcast notifications across the U.S. and the territories to identify a small number of vehicle owners where direct contact information is not available. In fact, it is hard to assure how any broadcast method could ever meet the requirement of being “reasonably calculated” to reach owners when their individual contact information is not available.

As a result of these challenges and limitations, second-tier broadcast notifications should not be required.

⁹ 90 FR 1909 at 1915

4. The requirements for supplemental notifications create significant regulatory uncertainty.

We disagree with the discretionary approach NHTSA proposed in the SNPRM.¹⁰ The proposal lacks an objective means for determining whether a notification campaign is practical or appropriate and there are no limitations on the alternative electronic notification methods that the administrator may require in instances where such a determination is made. This has the potential to impose substantial costs on manufacturers, particularly if the agency were to decide that a nationwide television or radio campaign were required. Furthermore, there is also no way for manufacturers to seek recourse for appealing the agency's decision if they disagree with the practicality, feasibility, or effectiveness of the agency's alternative approach for contacting consumers or the costs that their proposal could impose.

NHTSA does not provide any detail on the circumstances or frequency that it intends to invoke this additional authority. The regulatory impact analysis also fails to consider examples of potential alternative notification campaigns that may be required or their associated costs. These estimates assume only one electronic notification per recall, whereas the proposal to require additional recall notifications by other electronic means essentially imposes limitless regulatory burden without restrictions or the need for the agency to justify the overall cost-benefits of the required alternatives.

Finally, the SNPRM requires electronic notifications for both interim and remedy notices. Requiring that manufacturers apply the proposed tiered notification strategy for interim notifications will provide limited effectiveness. Any owners that receive the electronic notice will not be able to take immediate action because a remedy is not yet available. This risks owner desensitization to recall information received via electronic means. The agency should have provided supporting research on the effectiveness and corresponding burden of requiring interim notifications.

5. The proposed rule constrains manufacturers' ability to effectively reach consumers by requiring a 5-year plan.

Auto Innovators is concerned with the estimated burden associated with the agency's proposal to require both long-term and recall-specific electronic notification plans and the lack of related benefit. NHTSA's proposed approach removes the ability for manufacturers to adapt and implement new strategies for engaging with vehicle owners by imposing arbitrary timelines for making changes to the plan.

- **Five year recall notification plan.** The SNPRM requires that manufacturers submit (by the effective date of the rule) an "electronic recall notification plan." At a minimum, this plan must describe the means of electronic notification that the manufacturer anticipates using for its recalls. As proposed, manufacturers must also follow the approaches outlined in their recall notification plan. If changes to the plan are needed, manufacturers must notify the agency at least 10 business days in advance.¹¹ This requirement adds substantial burden without commensurate benefit, and is inconsistent with the lessons learned from recent high-profile recall campaigns where manufacturers deployed multiple consumer engagement strategies based on data analytics or the unique circumstances encountered at various stages of a campaign.¹²

¹⁰ "NHTSA again is proposing to retain agency discretion to require manufacturers to issue additional recall notifications by other electronic means if a manufacturer's chosen means is impractical, does not feasibly reach all of the impacted purchasers or owners, or the agency otherwise deems the means inappropriate."

¹¹ <https://www.federalregister.gov/d/2024-31011/p-211>

¹² The Independent Monitor of Takata and the Coordinated Remedy Program Update on the State of the Takata Airbag Recalls, Dec. 22, 2020 https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/state_of_takata_air_bag_recalls_fourth_report.pdf

Maintaining flexibility will likely require frequent updates to the 5-year plan to account for new methods not previously contemplated by manufacturers in their original submissions plan. This adds to the administrative burden and creates barriers to implementation of timely recall notifications. As a result, we do not support the requirement for manufacturers to maintain a five-year plan. OEMs already have established processes in place, and it is important that they have continued flexibility to modify their approaches to adapt to the unique circumstances of any given recall campaign.

- **Electronic Recall Notification Plan.** The SNPRM revises its pending burden-hours estimate to account for the proposed requirement that manufacturers submit an electronic recall notification plan prior to notifying consumers through electronic means. This estimate is vastly underestimated given the number of personnel required to develop each plan. We urge NHTSA to consider surveying affected entities to determine a more accurate burden estimate prior to issuing a final rule. NHTSA should have published a Preliminary Regulatory Impact Analysis (PRIA) to justify its proposals and establish more realistic estimates.

6. The rule fails to consider limitations with the existing recall framework in the U.S.

Auto Innovators supports efforts to leverage voluntary electronic communications for improving consumer awareness and increasing overall recall completion rates. However, the rule misses the mark and requires manufacturers pursue communications strategies that are both ineffective and highly burdensome.

A more holistic approach to recall awareness is needed. Federal and state policymakers must ensure the necessary policy frameworks are in place to support future success. Key elements include the need for a more comprehensive national approach to recall awareness, ensuring and promoting the availability of recall grants for states to provide recall notifications during the vehicle registration and inspection process, and public education on the importance of checking for open recalls. Moreover, and perhaps most relevant to this rulemaking proceeding, we encourage NHTSA to work with state policymakers to enhance state data systems to ensure up-to-date vehicle owner and/or registration information.

In our view, these approaches can enhance recall completion rates and increase consumer awareness more effectively than the proposed rule. In addition, these improvements are also expected to result in substantial burden reductions with the current first-class mail requirements by addressing the root causes of inaccurate or incomplete information used to contact vehicle owners. Additional details on each of these approaches is provided in the Auto Innovators Recall Policy Recommendations document that is attached in Appendix A.¹³

Please contact me if you have any questions.

Sincerely,



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

¹³ Auto Innovators Recall Policy Recommendations: Ensuring a Comprehensive Approach (March 2022)
<https://www.autosinnovate.org/resources/downloads-for-press/March%202022%20AAFI%20Recall%20Policy%20Recommendations.pdf>

Appendix A

Auto Innovators Recall Policy Recommendations: Ensuring a Comprehensive Approach (March 2022)



RECALL POLICY RECOMMENDATIONS

Ensuring a Comprehensive Approach

March 2022

Almost one in five vehicles on the road today are subject to an open recall, for which vehicle manufacturers typically offer a free remedy or repair. In the United States, when a vehicle recall is initiated by a manufacturer, notices regulated by the National Highway Traffic Safety Administration (NHTSA) are sent to vehicle owners to inform them of the recall. This includes information on the reason for the recall and on how the owner can have the vehicle remedied or repaired free of charge at an authorized car dealer for a vehicle first purchased in the last 15 years.

Ultimately, having a recall repair completed is a decision made by the vehicle owner. But it is important that consumers take action to address roadway safety. Although manufacturers provide notices and often provide additional reminders when there is a recall on a particular vehicle, challenges remain in getting some consumers to act and schedule any necessary safety recall remedy. In addition, in some cases, establishing contact with the vehicle owner to advise of the recall can be a significant impediment. This is further complicated by changes in vehicle ownership or by outdated contact information, particularly for older vehicles.

Public and private sector policy changes and actions can help increase recall awareness and completion.

It is the shared goal of automakers, and we hope the shared goal of all stakeholders, to reach a 100 percent completion rate for recalled vehicles that are still on the road. To help address these challenges, this document highlights potential public and private sector efforts along with some actions that can help increase recall awareness and completion. Through collaborative multi-stakeholder engagement, we

can develop a more holistic safety culture that focuses on enhanced consumer recall awareness and efforts to encourage owners to address incomplete safety recalls on their vehicles – free of charge. Private sector entities and policymakers at all levels of government should explore these ideas and any others that might help reach this important consumer safety goal.

ONGOING AUTO INDUSTRY EFFORTS TO INCREASE RECALL COMPLETIONS

Manufacturers continue to play a primary role in ensuring vehicle recall repairs are completed, and have proactively developed innovative solutions to help increase consumer awareness. In 2018, an industry partnership with the trade associations that combined to form the Alliance for Automotive Innovation along with CARFAX established an innovative tool, known as the Vehicle Recall Search Service (VRSS), which allows public and private sector entities to automatically check up to 10,000 vehicles at the same time for potential open recalls free of charge.¹ To date, organizations such as insurance companies, rental car fleets, business fleet managers, ride sharing programs, federal and state government agencies – including Departments of Motor Vehicles, automotive parts recyclers, finance companies, and more, have been successfully integrating VRSS recall data to enhance both their internal processes, as well their regular interactions with vehicle owners. The auto industry is encouraged by the tremendous success of the program, and recently surpassed ONE BILLION vehicle checks for open recalls, and is hopeful that more organizations take action to benefit from this free service.²

¹ <https://www.reuters.com/article/us-autos-safety/automakers-launch-online-tool-to-look-up-car-recall-idUSKBN1GZ2R7>

² Organizations and government agencies can apply to access the tool at: <http://www.vehiclerecallsearchservice.org/>



POLICY AND PROCESS RECOMMENDATIONS FOR IMPROVING RECALL REPAIRS

Public and private stakeholder organizations can utilize policies, programs, and processes that can help redefine the status quo and ultimately advance vehicle safety by reducing the number of open recalls.

Recommendations to Federal Government / DOT-NHTSA

Ensure a Comprehensive National Approach to Recall Awareness – The federal government plays a pivotal role in convening stakeholders and encouraging a consistent, comprehensive, national framework that supports increased recall awareness in the United States. With an increasing emphasis on a “Safe Systems” approach to vehicle and roadway safety by federal agencies, U.S. Department of Transportation (DOT) and NHTSA should embrace recall awareness, and provide guidance and recommendations for how the broader safety community can help increase awareness of this important issue.³ In addition, establishing regular forums for collaborative engagement on enhancing recall awareness and repairs, such as a DOT roundtable event, could help identify additional, proactive solutions to advance a more modernized and holistic approach to promoting recall awareness and ultimate repair or remedy to impacted vehicles.

Ensure Availability of Recall Grants for States – In January 2021, DOT announced three states – California, Texas, and Ohio – would receive grants to provide open recall information to owners during the vehicle registration process and via other points of contact. These states were “encouraged to consider recall notification during driver’s license renewal, emissions checks, or safety inspections.”⁴ DOT-NHTSA should seek to maintain federal grant funding to ensure states have access to the necessary resources to implement any IT or related infrastructure changes needed to provide recall information. At the same time, DOT-NHTSA should be careful to avoid burdensome reporting requirements that may disincentivize state participation. This grant initiative should be expanded to include other states to allow the DOT-NHTSA to determine the efficacy of this approach and aim to reach all 50 states.

Consistent Recall Checks of Federal Government Fleet Vehicles – As of 2020, the federal government maintained a vehicle fleet of more than 640,000 vehicles.⁵ The federal government should embrace policies or practices that require agencies to conduct regular reviews of their fleet vehicles, including unique Vehicle Identification Number (VIN) searches for open recalls, so that any affected vehicles can be identified and repaired. Further, prior to the resale of these government fleet vehicles, the government should adopt a policy of performing a recall check and obtaining any needed safety recall remedies.

A **Vehicle Identification Number** (or VIN) is a unique sequence of numbers and letters used to identify a vehicle.

No two vehicles have the same VIN, and the information can be used to identify whether a vehicle has an open recall.

Research and Public Education – DOT-NHTSA should build upon their ongoing efforts to increase consumer awareness of the importance of safety recalls (via NHTSA.gov) and the need to take action. These outreach efforts should include periodic research on how consumer attitudes about recalls may change over time, and whether opportunities may exist to build upon the success of programs such as NHTSA’s Vehicle Safety Recalls Week to engage with consumers more effectively on a consistent basis.

³ <https://www.nhtsa.gov/press-releases/nhtsa-launches-influencer-campaign-educate-drivers-safety-features>

⁴ <https://www.nhtsa.gov/press-releases/nhtsa-announces-three-states-awarded-dmv-recall-grants>

⁵ GSA Federal Fleet Report: <https://www.gsa.gov/policy-regulations/policy/vehicle-management-policy/federal-fleet-report>

Recommendations to State Policymakers

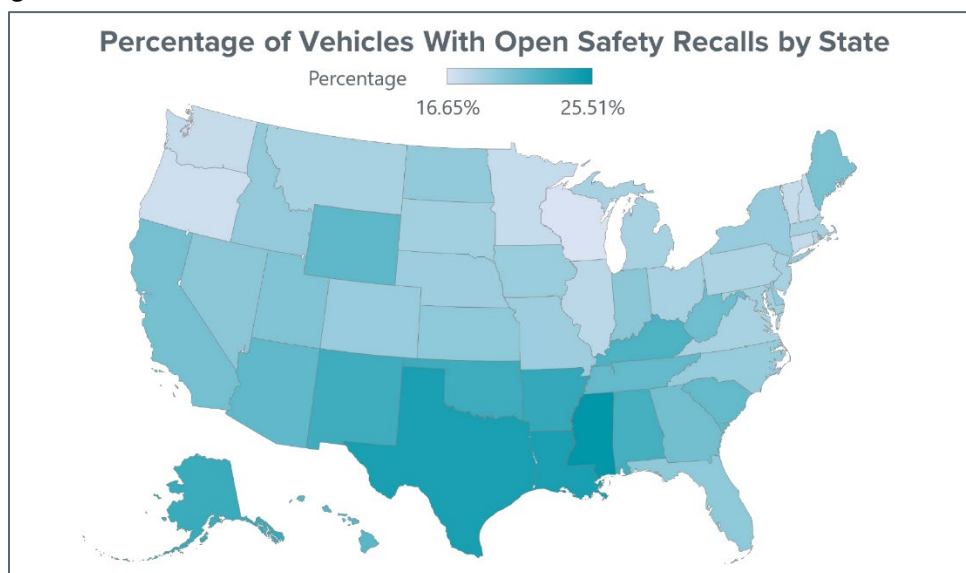
Consistent Recall Checks of State Government Fleet Vehicles – Similar to the federal government, states typically maintain large fleets of government vehicles. States should establish processes that require periodic checks of these vehicles for open recalls so that any necessary safety recall remedies can be performed.

Legislation or Regulations to Enhance Recall Awareness and Repair – States play a pivotal role in helping redefine the safety culture of vehicle recall completion by enhancing the policies surrounding vehicle registration, inspection, and sales, to improve consumer awareness. In addition, states speak to their residents from a trusted and authoritative position that is less likely to be mistaken for spam or other marketing communications.

Vehicle Registration Process – Typically, when a vehicle is registered in a state, the owner is required to provide the VIN associated with that vehicle. States should use tools like the free VRSS during the registration process to automatically check for open recalls and communicate this information to the vehicle registrant on their registration renewal documentation and encourage prompt recall repair.

State Safety/Emissions Inspection – States should consider providing recall information as part of the vehicle inspection process. Several states require a vehicle safety or emissions inspection either on an annual (or biannual) basis, or prior to the sale or transfer of ownership. Similar to the vehicle registration process, a number of states now provide vehicle owners with recall information as part of this inspection process. This again can help raise awareness of outstanding vehicle recalls with states playing a leading role in improving safety for its residents.

Enhancing State Data Systems – States should explore opportunities to build upon existing administrative processes to ensure up-to-date owner information. This assists the process of identifying vehicle owners with open recalls, so that recall related information can be communicated to the appropriate individuals. In some cases, this may require policymakers to ensure adequate funding to the relevant organizations within their state.



Click image to view data, or visit: <https://bit.ly/RecallData>⁶

⁶ Data Source: <https://www.carfax.com/recall/>

Recommendations to Private Sector Stakeholders

In addition to public sector initiatives, the private sector can play a significant role in advancing safety and improving recall completion rates through increased public awareness on the recall status of their vehicles.

Providing Value-Added Safety Information to Consumers – Every day, there are millions of transactions that rely on the unique VIN assigned to each vehicle. Many of these interactions involve routine fleet inspection, vehicle service, sale or lease, or insurance renewal, among others. Each of these “touch points” provides a new opportunity for informing consumers about open recalls and reinforce the importance of ensuring all necessary safety recall repairs are performed free of charge.

Technology solutions, such as the VRSS, provide a seamless means for integrating up-to-date recall information as part of business-related products and services without creating any additional obligations for participating organizations. While the number of businesses leveraging the tool continues to expand, all eligible organizations should consider the additional value for consumers in ensuring access to relevant safety information, particularly where there are challenges in reaching underserved populations or owners of older vehicles where contact information may not be up to date.

Proactive efforts for providing important safety information across the automotive ecosystem could add significant value for consumers.

Insurance companies – Provide recall information to consumers when checking or renewing their auto policy.

Fleet managers – Check vehicle fleet as part of regular maintenance to ensure repairs are completed.

Parking and tolling operations – Information could be communicated when providing billing statements.

Auctions and used vehicle dealers – Information can be used to check inventory in order to initiate repairs or notify purchaser.

Consistent Checks of Business Fleet Vehicles – Throughout the United States, businesses of all sizes maintain fleets of vehicles to help support the movement of goods, people, and services. Organizations should conduct periodic reviews of these fleets to ensure outstanding recalls are identified and necessary repairs completed free of charge. This can be achieved in a number of ways: by entering the unique VIN on the NHTSA or VRSS recall check website, or through integration with software solutions that allow for batch processing of VINs.