

July 28, 2023

Ms. Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Agency Information Collection Activities; Notice and Request for Comment;
Alcohol-Impaired Driving Segmentation Study; Agency/Docket Number: NHTSA-
2022-0077, Document Number: 2023-12102**

Dear Acting Administrator Carlson:

On June 7, 2023, 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 nationwide alcohol-impaired driving segmentation study to learn about alcohol-consumption behaviors and how they relate to potential impaired driving (the Notice). The one-time voluntary study will be used to obtain information to better understand attitudes and behaviors related to alcohol-impaired driving that will be used to enhance and refine communication strategy and tactics. 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 more than 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.

A June 2023 NHTSA Alcohol-Impaired Driving report found:

- In 2021 there were 13,384 fatalities in motor vehicle traffic crashes in which at least one driver was alcohol impaired. This represented 31 percent of all traffic fatalities in the United States for the year.
- Fatalities in alcohol-impaired-driving crashes increased by 14.2 percent (11,718 to 13,384 fatalities) from 2020 to 2021.
- One alcohol-impaired-driving fatality occurred every 39 minutes in 2021, on average.
- The 21- to 24-year-old age group and the 25- to 34-year-old age group had the highest percentages (27% each) of alcohol-impaired drivers involved in fatal crashes compared to other age groups in 2021.
- In 2021 there were about 4 male alcohol-impaired drivers involved for every female alcohol-impaired driver involved.
- The percentages of alcohol-impaired drivers involved in fatal crashes in 2021 was highest for motorcycle riders (28%) compared to drivers of passenger cars (24%), light trucks (20%), and large trucks (3%).
- Of the 1,184 traffic fatalities in 2021 among children 14 and younger, 25 percent (294) occurred in alcohol-impaired-driving crashes.
- In 2021, among the 13,384 alcohol-impaired-driving fatalities, 67 percent (9,027) were in crashes in which at least one driver had a BAC of .15 g/dL or higher.
- The rate of alcohol impairment among drivers involved in fatal crashes in 2021 was 2.8 times higher at night than during the day.

The Notice proposes that, in order for NHTSA's public awareness campaigns on drunk driving to be effective they must effectively “compete” for audience attention in the public domain among hundreds of other major marketers, including those in the alcoholic beverage industry that strategically target messages to particular groups of the public marketplace. In the consumer marketing context and environment, NHTSA must work to convince members of the driving/riding public not to operate vehicles when impaired by alcohol. Accordingly, NHTSA finds that it is necessary to conduct research, as authorized by the National Traffic Motor Vehicle Safety Act, to conduct research that will allow NHTSA to better tailor its communication strategies.

The segmentation profiles will be used by NHTSA's Office of Communications and Consumer Information to better target and reach intended audiences with communications messages and techniques that are relevant and meaningful to people within the target market.

NAMIC supports this effort and applauds NHTSA for working on this critical problem. NAMIC is a board member of Advocates for Highway and Auto Safety and an associate member of both the Governor's Highway Safety Association and the National Alliance to Stop Impaired Driving – we strongly support NHTSA safety initiatives that include additional research to better inform and improve the effectiveness of laws implementing tougher impaired-driving provisions. NAMIC supports federal efforts by and funding for NHTSA to help develop in-vehicle technology to prevent drunk driving. NAMIC also stands behind efforts at the state level by law enforcement and all aligned stakeholders to reduce drunk-driving fatalities and injuries.

Going forward, we suggest that NHTSA seek input from 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 that NHTSA may propose for the performance and efficacy of the proposed reporting. 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.

A handwritten signature in blue ink, appearing to read 'Thomas J. Karol', is positioned above the printed name.

Thomas J. Karol

General Counsel – Federal
National Association of Mutual Insurance Companies