

July 15, 2025

Cem Hatipoglu  
Associate Administrator, Office of Vehicle Safety Research  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Agency Information Collection Activities; Notice and Request for Comment;  
Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors  
[Docket No. NHTSA-2025-0021]**

Dear Associate Administrator Hatipoglu:

On May 16, 2025, the National Highway Traffic Safety Administration (NHTSA) published in the Federal Register the above referenced Notice and request for comments on revision of a currently approved collection of information. (the Notice). 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 over 1,300 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 48 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.

The Notice describes this information collection as a revision of a currently approved information collection, OMB Control Number 2127-0756, "Drivers' Use of Camera-Based Rear Visibility Systems Versus Traditional Mirrors." NHTSA states that it is conducting research as part of a multiyear effort to gather information to aid in determining whether camera-based rear visibility systems can provide the same level of safety as the rearview mirrors currently required under FMVSS No. 111, Rear Visibility.

NHTSA published an ANPRM (RIN 2127-AM02), and in particular, responding to two petitions received from vehicle manufacturers seeking permission to install camera-based rear visibility systems (CMS), instead of outside rearview mirrors, on both light vehicles and heavy trucks. In the ANPRM, NHTSA outlined a list of issues and related questions on which the agency requests additional information to adequately evaluate the safety of permitting CMS as an alternative compliance option to rearview mirrors.

The Notice contends that this research will help answer important safety questions posed in the ANPRM and inform NHTSA's response to the petitions by aiding in determining whether CMS can provide at least the same level of safety as the currently required mirrors. NHTSA proposes to recruit approximately 160 paid volunteers from the Columbus, Ohio area, who are licensed drivers aged 25-65 years, who have a clean driving record, drive at least 11,000 miles annually and meet minimum physical standards. The proposed Experimental Data Collection will consist of interviews, questionnaires, and 245 minutes of stationery, track-based, or on-road, semi-naturalistic driving experimentation, where data will be recorded on each participants driver eye glance behavior and driving or other protocol-related performance.

The Notice request public comment on any aspect of this information collection, including (a) whether the proposed collection of information is necessary for the proper performance of the functions of NHTSA, including whether the information will have practical utility; (b) the accuracy of the estimate of the burden of the proposed information collection; (c) ways to enhance the quality, utility and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents.

NAMIC does not feel qualified to comment on (b) through (d), but we do have questions regarding the practical utility of the information. It would be helpful for NHTSA in request for comment to provide greater details the safety purposes behind tracking drivers' eye glance behavior and aspects of driving performance with rearview mirrors and camera-based systems. Similarly, more specifics on how and why the size and composition representative sample was determined to be of value would be instructive to considering practical value of the exercise. A one-time study of the eye movement of 156 Midwest drivers may in fact provide practical value to a safety assessment, but it may also seem more anecdotal than demonstrative.

In addition to greater information on the benefits of the study, the Notice does not appear to address the cost side of a cost benefit analysis. In addition to NHTSA time and resources allocated to the proposed work, the Notice provides that “Research participants are paid volunteers.” The Notice does not define which of the 1,994 participants will receive pay or expenses, or how much. In addition, the Notice states “*Estimated Total Annual Burden Cost: \$0.*”

In general, NAMIC supports NHTSA’s proposed collections of information as necessary for the proper performance of the functions of the Agency, including whether the information will have practical utility. NHTSA providing more of the information detailed above would be helpful to us continuing that support.

Going forward, we strongly encourage NHTSA to continue to seek input from more representatives of 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 in these areas.

If you have any questions or require further information, please contact me at [tkarol@namic.org](mailto:tkarol@namic.org). Thank you for your time and consideration.



Thomas J. Karol

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National Association of Mutual Insurance Companies

