

December 17, 2025

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**Agency Information Collection Activities; Notice and Request for Comment; Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS)
Docket No. NHTSA-2025-0721**

Dear Administrator Morrison:

The Fatality Analysis Reporting System (FARS) is crucial to the missions of the National Highway Traffic Safety Administration (NHTSA), the Insurance Institute for Highway Safety (IIHS), and many other organizations working to protect people on our roadways. IIHS encourages NHTSA to prioritize this fundamental resource and ensure its continued funding.

IIHS is an independent, nonprofit scientific and educational organization dedicated to reducing deaths, injuries and property damage from motor vehicle crashes through research and evaluation and through education of consumers, policymakers and safety professionals. IIHS is wholly supported by auto insurers.

For the past 50 years, IIHS has relied on FARS as the most accurate and complete database of the fatalities that occur on our roadways. Fatalities represent the most serious outcome that road safety professionals work to prevent, and maintaining a consistent and a reliable census of traffic deaths is essential to tracking our progress in improving safety.

To be sure, FARS is not without flaws. The main one is that it takes NHTSA 2–3 years to amass, certify, and release each year's dataset. Other data sources, such as telematics information and police-reported crash files maintained at the state level, provide faster insights on crashes and risky behaviors. Researchers at IIHS and elsewhere frequently turn to these alternatives when we need recent data. However, no other source can substitute for the comprehensive picture that FARS offers. And while NHTSA may be able to speed up FARS data releases by simplifying certain data elements or the system's relational database structure, it's critical that any such changes maintain accuracy and year-to-year compatibility of the data. NHTSA should seek public comment on any substantial proposed changes to FARS.

NHTSA could not do its job without FARS. It uses this data system to set priorities, evaluate countermeasures, and, ultimately, to guide every change it makes to motor vehicle regulations. For example, NHTSA has used FARS to estimate the effectiveness of and the number of lives saved by seat belts, airbags, child restraints, motorcycle helmets, and the various Federal Motor Vehicle Safety Standards (e.g., Kahane & Simons, 2024). The database is also a vital resource for partners in the fight for road safety such as other U.S. Department of Transportation agencies, Congress, nonprofit organizations, contractors, and the American public.

The Honorable Jonathan Morrison
December 17, 2025
Page 2

FARS has been the basis of much of the research conducted by IIHS as well. The database's comprehensive statistics have helped us to establish the effectiveness of life-saving countermeasures such as electronic stability control, antilock braking systems on motorcycles, graduated driver licensing laws, red light safety camera programs, side airbags, and frontal airbags. FARS has helped us evaluate our own crash-testing programs and identify crash types to address with new tests. FARS data have also been critical for identifying and quantifying important risk factors, including high speed limits and vehicle incompatibility. Many of the ways IIHS uses FARS data can be seen in the summaries of our research efforts available on our website at <https://www.iihs.org/research-areas>. IIHS is also using FARS to measure progress on our 30x30 initiative to reduce traffic fatalities 30% by 2030—a goal we invite NHTSA and others to join us in pursuing.

For all these reasons, it is essential that NHTSA remain committed to supporting this fundamental information resource.

Sincerely,

A handwritten signature in black ink, appearing to be 'Eric Teoh', written over a large, light-colored oval shape.

Eric Teoh
Director of Statistical Services

References

Kahane, C. J., & Simons, J. F. (2024). *Fatalities, injuries, and crashes prevented by vehicle safety technologies and associated FMVSS, 1968 to 2019 – Passenger cars and LTVs* (Report No. DOT HS 813 611). National Highway Traffic Safety Administration.
<https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813611>