

January 20, 2026

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
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), a nationwide census of fatal motor vehicle crashes maintained by the National Highway Traffic Safety Administration (NHTSA), has been in place since 1975 and is widely regarded as the most accurate and complete source of fatal crash data in the country. The American Property Casualty Insurance Association (APCIA) encourages NHTSA to prioritize this vital resource, which plays a critical role in protecting the safety of America's roadways.

Representing nearly 66 percent of the U.S. property-casualty insurance market, APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers. APCIA represents the broadest cross-section of home, auto, and business insurers of any national trade association. Its members span all sizes, structures, and regions, collectively working to protect families, communities, and businesses across the United States and around the world.

Auto safety development in the United States depends on an integrated network of stakeholders including motor vehicle manufacturers, safety organizations, and government entities, working toward the common goal of saving lives. Among these stakeholders is the Insurance Institute for Highway Safety (IIHS). Funded and supported by America's insurers, IIHS has spent decades developing standards and innovative solutions to improve vehicle and roadway safety. IIHS and similar organizations rely heavily on data produced by NHTSA, the U.S. Department of Transportation, and other governmental entities to advance their missions.

Since FARS was first established in 1975, IIHS has relied on it as the most accurate and complete database of roadway fatalities. In the landscape of motor vehicle safety initiatives, no priority is more important than reducing fatalities—and FARS is essential to that effort. No other resource provides the same comprehensive, nationwide perspective that FARS delivers.

While other sources — such as telematics data and state-maintained police-reported crash files — may offer more timely insights into emerging crash patterns and risky behaviors, FARS serves as a reliable baseline for comparative analysis year after year. Safety improvements are rarely the result of a single innovation, program, report, or piece of legislation; rather, safety requires sustained, standardized measurement over time. FARS is a key tool in establishing those baselines and enabling continued development of effective safety measures.

In terms of economic and financial factors affecting automobile insurance, insurers rely on accurate, comprehensive crash and fatality data, such as that provided by FARS, to understand the underlying drivers of loss costs, one of the most significant determinants of auto insurance premiums. FARS, as part of a broader ecosystem of data and research, provides essential insight into the causal factors of crashes, including human behavior, vehicle characteristics, and environmental conditions. Over time, these factors help insurers assess collision frequency and severity trends that directly influence insurance affordability for consumers. Insurance coverage is most affordable when it is most accurately priced — something insurers can achieve only when they have the data and tools necessary to price their products accurately and fairly in a competitive market.

It has often been said that “[i]f you can't measure it, you can't improve it.” To save lives on America’s roadways, we must measure the lives lost, work to understand why those losses occurred, and continue to improve the safety standards governing vehicles and roadways. Accordingly, APCIA and our member insurers encourage NHTSA to remain committed to the continued production and improvement of FARS, now and in the future.

Sincerely,

Michael Richmond-Crum

Michael Richmond-Crum
Senior Director, Personal Lines & Counsel
The American Property Casualty Insurance Association