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Ryan Russo

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January 20, 2025

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590-0001

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

Administrator Morrison,

On behalf of the National Association of City Transportation Officials (NACTO), I am responding to the National Highway Traffic Safety Administration's (NHTSA) request for comment on the extension of data reporting requirements for the Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS) [Docket No. NHTSA-2025-0721].

NACTO's member cities have significant leadership and experience in road safety, planning, studying, and implementing proven tools to reduce serious injuries and fatalities on their streets. The availability of FARS data is crucial to understanding and developing appropriate and successful interventions that protect the traveling public.

NACTO encourages NHTSA to prioritize FARS reporting as a fundamental resource and ensure its continued funding. Fatalities represent the most serious outcome that our member agencies work to prevent. Maintaining a consistent and reliable census of traffic deaths is essential to tracking our progress in improving safety. NACTO member agencies use FARS in combination with other data sources, such as telematics data and state-level police-reported crash files, to understand the locations and causes of crashes and the risky behaviors that contribute to them.

FARS is not without flaws. It takes NHTSA two to three years to compile, certify, and release annual datasets. 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. 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, state Departments of Transportation, metropolitan planning organizations, and local governments. It is essential that NHTSA remain committed to supporting this fundamental information resource.

We sincerely appreciate the NHTSA's efforts to advance safety through thoughtful research and stakeholder engagement. Thank you for the opportunity to contribute to this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Russo", with a long horizontal flourish extending to the right.

Ryan Russo
Executive Director
National Association of City Transportation Officials