

January 20, 2026

DOT Docket No. NHTSA-2025-0721

Docket Management Facility
U.S. Department of Transportation
West Building, Ground Floor
Room W12-140
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590-0001
Filed via www.regulations.gov.

**Agency Information Collection Activities; Notice and Request for Comment;
Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS)
90 Federal Register 51812, November 18, 2025**

The undersigned file these comments in response to the National Highway Traffic Safety Administration's (NHTSA, agency) Notice and Request for Comment (RFC) regarding Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS).¹

Motor Vehicle Deaths Remain Historically High

America's roads are moving an ever-increasing number of people and goods.² This activity comes with a significant human toll, infrastructure challenge and price tag. On average, 112 people were killed every day on roads in the U.S., totaling nearly 41,000 fatalities in 2023.³ This is a 24 percent increase in deaths in just a decade.⁴ An additional 2.44 million people were injured.⁵ Early projections for 2024 traffic fatalities remain at a similar historic high level; over 39,000 people are estimated to have been killed that year.⁶ Additionally, in 2021, the most recent year for which data is available according to the Non-Traffic Surveillance (NTS) system, an estimated 3,990 people were killed in non-traffic motor vehicle crashes, an increase of 26 percent from 2020.⁷

These devastating crashes impact millions of Americans each year including the families of U.S. Department of Transportation (U.S. DOT) Secretary Duffy and Members of Congress. These tragedies result in long-lasting effects which often are not accounted for in statistics alone. For every single death and serious injury, there is a horrific ripple effect forever changing the lives of children, parents, friends and communities.

¹ 90 FR 54619 (Nov. 18, 2025).

² 2025 Report Card for America's Infrastructure, American Society of Civil Engineers, <https://infrastructurereportcard.org/cat-item/roads-infrastructure/>

³ Traffic Safety Facts 2023: A Compilation of Motor Vehicle Traffic Crash Data, NHTSA, Aug. 2025, DOT HS 813 738 (Annual Report 2023).

⁴ Annual Report 2023; [comparing 2013 to 2023].

⁵ Annual Report 2023.

⁶ Traffic Safety Facts: Crash Stats, Early Estimate of Motor Vehicle Traffic Fatalities in 2024, NHTSA, Apr. 2025, DOT HS 813 710 (Early Estimates 2024).

⁷ Non-Traffic Surveillance: Fatality and Injury Statistics in Non-Traffic Crashes in 2021, NHTSA, Apr. 2024, DOT HS 813 359.

In addition to the physical and emotional repercussions and infrastructure damage due to motor vehicle crashes, the annual economic cost is approximately \$340 billion (2019 dollars).⁸ This figure equates to every person living in the U.S. essentially paying an annual “crash tax” of over \$1,000. Moreover, the total value of societal harm from motor vehicle crashes in 2019, which includes loss of life, pain and decreased quality of life, was nearly \$1.4 trillion.⁹ When adjusted solely for inflation, this figure amounts to over \$1.79 trillion.¹⁰ Research from the Network of Employers for Traffic Safety (NETS) finds motor vehicle crashes cost employers \$72.2 billion in direct crash-related expenses in 2019.¹¹

NHTSA’s Crash Databases Are Critical to Improving Roadway Safety

As stated in the current RFC, “NHTSA’s mission is to save lives, prevent injuries, and reduce economic losses resulting from motor vehicle crashes. In order to accomplish this mission, NHTSA needs high-quality data on motor vehicle crashes.”¹² For five decades, FARS has provided that data by compiling essential information about “all crashes involving fatalities that occur on our nation’s roadways.”¹³ Similarly, NTS collects important data regarding non-traffic crashes and non-crash injuries and fatalities.¹⁴

Numerous stakeholders have long used FARS data to better understand motor vehicle crashes, conduct groundbreaking research and advance solutions to help improve public safety on our Nation’s roads.¹⁵ FARS is essential to NHTSA’s promulgation of Federal Motor Vehicle Safety Standards (FMVSS). According to the agency, “[t]he FMVSS [Federal Motor Vehicle Safety Standards] remain NHTSA’s core way of ensuring that all motor vehicles provide the requisite level of safety performance and provide it within a technical timeframe.”¹⁶ In fact, NHTSA has estimated that from 1968 through 2019, NHTSA’s safety standards have prevented more than 860,000 deaths, 49 million nonfatal injuries and damage to 65 million vehicles.¹⁷ In addition, during that time frame the comprehensive societal benefits amounted to \$17.3 trillion, using 2019 dollars.¹⁸ Moreover, FARS data has helped to advance numerous safety technologies such as electronic stability control (ESC), airbags and antilock braking systems.¹⁹

⁸ The Economic and Societal Impact of Motor Vehicle Crashes, 2019, NHTSA, Dec. 2022, DOT HS 813 403. (Economic and Societal Impact 2019).

⁹ Economic and Societal Impact 2019.

¹⁰ CPI Inflation Calculator, BLS, available at https://www.bls.gov/data/inflation_calculator.htm, calculated from Jan. 2019 – Jan. 2025.

¹¹ Cost of Motor Vehicle Crashes to Employers – 2019, Network of Employers for Traffic Safety, March 2021.

¹² 90 FR 51813.

¹³ *Id.*

¹⁴ NHTSA, Crash Data Systems, Non-Traffic Surveillance.

¹⁵ Comment ID: NHTSA-2025-0721-0002.

¹⁶ 89 FR 76923, Sep. 19, 2024.

¹⁷ Kahane, C. J., & Simons, J. F. (2024, December). 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.

¹⁸ NHTSA: 50 Years of Vehicle Safety Standards Saved Hundreds of Thousands of Lives, Prevented Millions of Injuries.

¹⁹ Comment ID: NHTSA-2025-0721-0002.

Docket No. NHTSA-2025-0271

Page 3

January 20, 2026

Without this data and the other databases maintained by NHTSA efforts to address the leading causes of motor vehicle crashes would be severely hampered. As such, NHTSA must continue to support and maintain FARS and NTS.

Advocates for Highway and Auto Safety

American Automobile Association (AAA)

Governors Highway Safety Association

Mothers Against Drunk Driving (MADD)

National Safety Council

Safe Kids Worldwide