

January 16, 2026

Jonathan Morrison, Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Comments for Docket No. NHTSA-2025-0721-Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS)

Dear Administrator Morrison,

The Connecticut Department of Transportation (CTDOT) has reviewed the National Highway Traffic Safety Administration's (NHTSA) Notice and Request for Comments on the Agency Information Collection Activities for the Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS) (Docket No. NHTSA-2025-0721.) CTDOT offers the following comments:

(a) whether the proposed collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility

CTDOT strongly supports the continued collection of the information by NHTSA. The FARS data is the most complete, quality checked, and trusted data available for consumption by State Highway Safety Offices, policymakers, and safety professionals. Motor vehicle crash and fatality data is a critical component of any safety project undertaken by CTDOT. The programs and projects conducted by the Connecticut Highway Safety Office at CTDOT are data driven based on the crash and fatality data. The local and state police departments utilize the crash and the fatality data for data-driven enforcement activities and community engagement. The crash data files

maintained at the state level, or third-party telematics data, provide insights on crashes and risky behaviors. However, no other data source is thoroughly vetted and/or structured to provide the comprehensive picture that FARS data offers.

(b) the accuracy of the Department’s estimate of the burden of the proposed information collection

The projected burden by NHTSA may be an underestimate. Connecticut is an Electronic Data Transfer (EDT) State and NHTSA’s estimate to complete an EDT case is two (2) hours. The data required to complete a given FARS case is received piecemeal from several different agencies. Not all the reports received related to a case can be EDT – only the Police Crash Report is EDT. The data must be reviewed, analyzed, and interpreted to complete the FARS data elements and attributes. All the documentation related to each case has to be organized and maintained for a certain period per the record retention policies. With the majority of FARS cases, several revisions of the crash report are submitted by the police departments as the investigation progresses and until it’s complete. Each time, the FARS Analyst must review the revised documents and update the case information. Based on practical experience, each case may need an estimated 6-8 hours to complete, though this also depends on the complexity of the case and various other factors. It is understood that the time required is subjective and may differ.

(c) ways to enhance the quality, utility and clarity of the information to be collected

NHTSA has always provided excellent support and training to the FARS Analysts for data collection. The data collected for FARS needs complex interpretation of crash facts and is not straight forward to code. The in-person trainings conducted by NHTSA have tremendously helped FARS Analysts in Connecticut and across the country. The periodic remote refresher webinars and trainings help with enhancing the quality and the clarity of the information to be collected. In addition, the consultant support provided by NHTSA has tremendously helped Connecticut FARS Analysts in coding complex one-of-a-kind crash scenarios. CTDOT supports continuation of these best practices to enhance the quality of the FARS data.

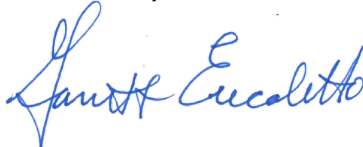
CTDOT collects and submits the FARS data to NHTSA as well as utilizes the data when published by NHTSA. Overall, the cycle takes about 2-3 years for the final data to be made available. While NHTSA may be able to speed up FARS data releases by simplifying certain data elements, it is imperative that any such changes maintain accuracy and year-to-year compatibility of the data.

(d) ways to minimize the burden of the collection of information on respondents, including the use of automated collection techniques or other forms of information technology

CTDOT has built several databases including one for Roadway Data, which will be used to automate the roadway-related information in the police crash report. CTDOT is currently working on developing a crash data system compliant with the Model Minimum Uniform Crash Criteria 6th Edition (MMUCC-6) and is actively identifying all the data fields that could be automated. This will reduce the burden on the FARS Analysts and, most importantly, will prioritize the safety of the first responders by allowing the crash scene to be handled more efficiently.

Thank you for the opportunity to comment on this Notice and Request for Comments. If further information is required on CTDOT's comments, please contact Joe Cristalli from the CTDOT Highway Safety Office at Joseph.Cristalli@ct.gov.

Sincerely,



Garrett T. Eucalitto

Commissioner

Connecticut Department of Transportation