



January 20, 2026

DOT/NHTSA

Chou-Lin Chen

Associate Administrator, National Center for Statistics and Analysis

1200 New Jersey Ave SE

Washington, D.C. 20590

[Docket No. NHTSA–2025–0721]

Dear Ms. Chen:

The Alliance for Automotive Innovation (“Auto Innovators”)¹ appreciates the opportunity to submit comments to National Highway Traffic Safety Administration (NHTSA) regarding its information collection activities in support of the Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS) databases.²

Continued data collection for both FARS and NTS is critical to NHTSA’s ability to understand the full scope of motor vehicle safety risks and to fulfill the Department’s statutory mission to reduce related fatalities and injuries. FARS provides comprehensive, nationally consistent data on fatal traffic crashes occurring on public roadways, while NTS plays a complementary role by capturing information on non-traffic incidents occurring in driveways, parking areas, private property, and other off-road environments. Both are authoritative data systems that support trend analysis, program evaluation, and evidence-based decision-making by government agencies, researchers, and other vehicle safety stakeholders. Together, these databases provide a highly accurate understanding of motor vehicle safety risks both on and off American roadways.

Auto Innovators supports the continued use of electronic reporting systems, standardized data elements, and reliance on existing information sources to minimize respondents’ reporting burdens. Efforts to continue streamlining data collection should help ensure efficiency while maintaining the integrity of FARS and NTS. Auto Innovators is generally supportive of NHTSA *enhancing* its real-world vehicle safety data collection activities as long as the agency properly

¹Auto Innovators represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country’s GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation’s largest manufacturing sector.

² <https://www.federalregister.gov/documents/2025/11/18/2025-20099/agency-information-collection-activities-notice-and-request-for-comment-fatality-analysis-reporting>



considers how to maintain continuity in data elements and collection methodologies to preserve the long-term comparability of these datasets.

The proposed information collection burden estimates appear reasonable given the long-standing nature of both FARS and NTS and the critical role these systems play in national motor vehicle safety analysis. The estimated labor hours and costs are consistent with historical reporting practices while reflecting a realistic assessment of the increased respondent efforts described. When weighed against their critical role in informing Department policy, program evaluation, and research direction, the associated data collection costs represent a well-justified investment relative to their public safety benefits.

In conclusion, Auto Innovators believes the proposed information collection supporting FARS and NTS is necessary, cost-effective, and consistent with the objectives of the Paperwork Reduction Act. These complementary datasets are critical to understanding both traffic and non-traffic motor vehicle safety risks, and the proposed approach appropriately balances the Department's data needs with respondent burden. We therefore support approval of the information collection as proposed.

Sincerely,

A handwritten signature in black ink, appearing to read "SP", followed by a horizontal line.

Sarah Puro
Vice President, Safety and Technology Policy
Alliance for Automotive Innovation