

May 11, 2026

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

Agency Information Collection Activities; Notice and Request for Comment; Crash Report Sampling System (CRSS), Non-Traffic Surveillance (NTS), and Special Study Data Collection. Docket No. NHTSA-2026-0463.

Dear Administrator Morrison:

The Insurance Institute for Highway Safety (IIHS) supports the National Highway Traffic Safety Administration's (NHTSA's) proposed extension of the Crash Report Sampling System (CRSS). IIHS relies on CRSS data to understand national trends and conduct research to improve traffic safety.

CRSS serves an important role as the only nationally representative sample of police-reported crashes. This data system is not as detailed as some others and there is always some trade-off between breadth and depth in crash data, but its advantage of being a national sample should not be overlooked. For instance, Kidd et al. (2023) used CRSS to identify more crash circumstances to include in IIHS's front crash prevention test program, which increases the technology's capabilities. In another study, Teoh (2023) used CRSS to show that left-turn-oncoming crashes are a major problem in motorcycle safety and noted that left-turn assist technology is a key opportunity to address this problem.

As such, IIHS supports the extension of CRSS and encourages NHTSA to ensure the year-to-year consistency in estimates derived from these data whenever any changes are made to data collection.

Sincerely,



Eric Teoh
Director of Statistical Services

References

- Kidd, D. G., Teoh, E. R., & Jermakian, J. S. (2023). How can front crash prevention systems address more police-reported crashes in the United States? *Accident Analysis & Prevention*, 191, 107199. <https://doi.org/10.1016/j.aap.2023.107199>
- Teoh, E. R. (2023). Left-turn crashes and motorcycle safety. *Traffic Injury Prevention*, 24(6), 511–512. <https://doi.org/10.1080/15389588.2023.2222327>