

Department of Transportation
National Highway Traffic Safety Administration
Information Collection Request Supporting Statements: Part A
Incident Reporting for Automated Driving Systems (ADS) and
Level 2 Advanced Driver Assistance Systems (ADAS)
OMB Control No. 2127-0754

Abstract:¹

This information collection request (ICR) is for an extension of a currently approved information collection that requires manufacturers of motor vehicles and equipment and operators of motor vehicles to submit incident reports for certain crashes involving Automated Driving Systems (ADS) and Level 2 Advanced Driver Assistance Systems (ADAS). NHTSA's Standing General Order 2021-01 (General Order) requires vehicle and equipment manufacturers and operators of vehicles equipped with ADS or Level 2 ADAS to report crashes that meet specified criteria to the National Highway Traffic Safety Administration (NHTSA).²

ADS and ADAS are emerging technologies that fundamentally alter the task of driving a motor vehicle by automating certain driver inputs (e.g., steering, acceleration, and braking) and decision making (e.g., path following and obstacle avoidance) that would otherwise be left solely to human control. Given the rapid evolution of these technologies and the testing of new technologies and features on publicly accessible roads, it is critical for NHTSA to exercise its oversight over potential safety defects in vehicles operating with ADS and Level 2 ADAS. The General Order provides the agency with critical and timely safety data, which assists the agency in identifying potential safety issues resulting from the operation of advanced technologies on public roads. Access to this crash data may show whether there are common patterns in vehicle crashes or systematic problems with specific vehicles or systems, any of which may reflect a potential safety defect.

This ICR covers the reporting requirements in the General Order with the modifications discussed in this document. The modifications in the third amendment to the General Order streamlined the reporting requirements in order to reduce reporting burdens and sharpen the focus on the reporting on safety critical information. Under the General Order, the reporting entities are required to report crashes where the ADS or Level 2 ADAS was engaged or in use at the time of or immediately (≤ 30 seconds) before the crash. With the latest amendment, Request No. 1 of the General Order will require reporting entities to report any crash involving an ADS or Level 2 ADAS that results in any individual being transported to a hospital for medical treatment, a fatality, a strike of a vulnerable road user, or an air bag deployment within five days

¹ The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) if the information collection involves approval by an institutional review board, include a statement to that effect; (8) the purpose of the collection; and (9) if a revision, a description of the revision and the change in burden.

² NHTSA issued a Third Amended Standing General Order on April 24, 2025, which superseded the Second Amended Standing General Order, effective June 16, 2025. A copy of the amended General Order is available on NHTSA's website at <https://www.nhtsa.gov/laws-regulations/standing-general-order-crash-reporting>.

of the reporting entity receiving notice of the crash.³ If the crash involved a subject vehicle equipped with an ADS, Request No. 1 also requires reporting entities to report any crash involving a vehicle tow-away. Under Request No. 3, an updated report is due within a month after receiving notice of any materially new or materially different information for specified fields: VIN, engagement status, source, highest severity alleged, subject vehicle damage, subject vehicle pre-crash movement, air bag deployment status for any vehicle involved, data availability, and narrative.

In the previous version of the General Order, Request No. 1 required reporting entities to report any crash involving an ADS or Level 2 ADAS that resulted in any individual being transported to a hospital for medical treatment, a fatality, or involved a vulnerable road user within one day and an updated report within ten days. Based on the agency's experience in reviewing these reports and consideration of public comments from interested stakeholders, NHTSA decided to amend the General Order to streamline the reporting requirements and focus on the types of reports that had most informed the agency's safety reviews in the past. There was no change to the five-day reporting timeline for crashes resulting in a vehicle tow-away or an air bag deployment without one of the other reporting criteria.⁴

Request No. 3 was similarly updated to require updates only for the specified fields, as opposed to requiring updates of any material new or materially different information about the incident.

Separately, under Request No. 2 of the General Order, the reporting entities also are required to report any crash involving an ADS-equipped vehicle that does not meet the previous criteria but nonetheless involves property damage. These reports are due on the fifteenth day of the month after the reporting entity receives notice of the crash. Specifically, ADS crashes that need to be reported under Request No. 2 are crashes resulting in property damage that is reasonably expected to exceed \$1,000, crashes where the subject vehicle was the only vehicle involved in the crash, or crashes where the subject vehicle struck another vehicle or object (as opposed to being struck). This Request narrows the scope of the Request in the previous version of the General Order, which required all ADS crashes to be reported.

If a reporting entity did not receive notice of any new or updated incidents in a given month, the previous version of the General Order required them to submit a report confirming the lack of any reportable information. The new version of the General Order eliminated this requirement, only requiring reports to be submitted when there is information to report.

The new version of the General Order further streamlined reporting by eliminating duplicate reporting requirements from multiple entities and reducing the number of fields required to be reported.

On March 6, 2023, OMB approved NHTSA's three-year extension of its information collection for the previous version of the General Order (OMB Control No. 2127-0754). NHTSA is now requesting a three-year extension of this information collection with modification.

³ The reporting entity may file this 5-day report early (i.e., before the fifth calendar day) to avoid having to file such a report on a weekend or holiday.

⁴ The previous version of the General Order did require crashes involving a vehicle tow-away to be reported for both ADS and Level 2 ADAS.

NHTSA significantly reduced the burden of this information collection through its changes to streamline the General Order. Specifically, the changes eliminated multiple categories of burden addressed in the prior Paperwork Reduction Act analysis, saving 5,639 burden hours annually. For other categories, NHTSA significantly reduced the burdens by eliminating unnecessary and duplicative reporting requirements. NHTSA also expects reporting to be more efficient now that most of the reporting entities have more than five years of experience reporting under the General Order and, as a result, have established internal processes for the reporting and employees trained to prepare such reports. With these changes, along with information received from reporting entities and NHTSA's improved ability to estimate burdens after more than five years of reporting under the General Order, NHTSA now estimates an annual burden of 19,208 hours and \$0—a substantial reduction from the estimated burden associated with the prior version of the General Order of 31,319 hours with no change in dollar amount. NHTSA requests comment on these estimates.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal and administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Under the National Traffic and Motor Vehicle Safety Act, as amended (the Safety Act), 49 U.S.C. Chapter 301, NHTSA is charged with authority “to reduce traffic accidents and deaths and injuries resulting from traffic accidents.” 49 U.S.C. § 30101. To carry out this statutory mandate, NHTSA has broad information gathering authority, including authority to obtain information on vehicle crashes, potential defects related to motor vehicle safety, and compliance with legal requirements to timely identify and conduct recalls for safety defects. *See* 49 U.S.C. § 30166(e)-(g); 49 CFR Part 510; *see* 49 U.S.C. §§ 30118-30120.

Both ADS and ADAS are “motor vehicle equipment” subject to the requirements of the Safety Act. *See id.* § 30102(8). Given the rapid evolution of these technologies and the testing of new technologies and features on publicly accessible roads, it is critical for NHTSA to exercise its oversight over potential safety defects in vehicles operating with ADS and Level 2 ADAS.⁵

Consistent with this mandate, NHTSA issued a General Order that requires vehicle and equipment manufacturers and operators of ADS and Level 2 ADAS vehicles to report certain crashes to the agency.⁶

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

⁵ A Level 2 ADAS is a driver support feature on a vehicle that can control both steering and braking/accelerating simultaneously under some circumstances. The human driver must remain fully and continuously engaged in the driving task. *See* SAE J3016 Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles § 5.3 (April 2021).

⁶ The reporting requirements in the General Order applicable to operators are specific to entities (and not individuals) operating ADS equipped vehicles. Likewise, there are no reporting requirements in the General Order applicable to individual owners, drivers, or passengers in vehicles equipped with Level 2 ADAS.

Through the General Order, NHTSA uses the information to evaluate whether specific manufacturers (including manufacturers of prototype vehicles and equipment) are meeting their statutory obligations to ensure that their vehicles and equipment are free of defects that pose an unreasonable risk to motor vehicle safety or are recalled if such a safety defect is identified. *See* 49 U.S.C. §§ 30112, 30118-30120.

NHTSA's oversight of potential safety defects in vehicles operating on publicly accessible roads using ADS or Level 2 ADAS requires that NHTSA have timely information on incidents involving those vehicles. In carrying out the Safety Act, NHTSA may "require, by general or special order, any person to file reports or answers to specific questions." *Id.* § 30166(g)(1)(A). Through the General Order, NHTSA requires each vehicle and equipment manufacturer and operator of vehicles with ADS and each vehicle or equipment manufacturer of Level 2 ADAS to report specified information about certain safety-related incidents involving vehicles operating on publicly accessible roads using ADS or Level 2 ADAS.

Specifically, the General Order requires manufacturers and operators to report certain crashes involving these vehicles that occur while the ADS or Level 2 ADAS is engaged, or immediately after it is in use, and to provide sufficient information for NHTSA to identify crashes warranting further follow-up. Under the terms of the General Order, crashes that meet specified criteria must be reported within five calendar days after the manufacturer or operator receives notice of the crash, and certain other ADS crashes must be reported on a monthly basis. Based on the agency's experience in reviewing these reports, and on the public comments received in response to the previous versions of the General Order, NHTSA decided to amend the General Order. The previous version of the General Order required reporting entities to report any crash involving ADS or Level 2 ADAS (engaged at any time in the 30 seconds prior to the crash or during the crash) that results in any individual being transported to a hospital for medical treatment, a fatality, or that involves a vulnerable road user within one day of the reporting entity receiving notice of the crash. NHTSA is amending the General Order to require reporting entities to submit reports for ADS or Level 2 ADAS crashes resulting in any individual being transported to a hospital for medical treatment, a fatality, or that involve a strike of a vulnerable road user no later than five calendar days after the reporting entity receives notice. The reporting obligations in the General Order are a primary source of information regarding potential safety defects in ADS or Level 2 ADAS. Changing this reporting requirement from one to five days maintained the investigative value of this information while reducing reporting burdens. Feedback received for prior version of the General Order indicated that the one-day turnaround for reports imposed substantial burdens by requiring the staff of reporting entities to be available at all times—including on weekends and holidays. In contrast, NHTSA's follow-up on the reports often did not occur for several days. In addition, in NHTSA's experience, most reporting entities proactively reach out to NHTSA directly, outside of the General Order reporting process, immediately after learning of particularly noteworthy crashes. This has enabled NHTSA to promptly engage with entities on such crashes irrespective of reports received under the General Order. As a result, NHTSA did not consider the broadly applicable requirement of one day reporting to warrant the degree of burden that it imposed.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of**

responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

This information collection (including the proposed extension) requires reporting entities to submit information in an electronic format, utilizing a dedicated website portal and a web-based form. The General Order includes instructions explaining how to set up an account with NHTSA, if an entity does not already have one, and how to submit the required information.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Prior to issuance of the General Order, NHTSA's then-existing information collections could not meet the objectives of this information collection due to their scope and submission requirements. NHTSA's existing early warning reporting (EWR) regulations, set forth in 49 CFR Part 579, Subpart C, require some vehicle and equipment manufacturers to submit reports on only a limited set of incidents involving deaths or injuries. These reports do not identify those vehicles equipped with ADS or Level 2 ADAS; they are submitted only when there is a claim or allegation of a defect by a third party; and they are only submitted quarterly. Operators of ADS-equipped vehicles are not required to report any information under EWR unless they otherwise qualify as a reporting manufacturer.

The information provided under the existing EWR regulations does not provide adequate information to identify potential safety defects in ADS and Level 2 ADAS systems. Crashes resulting in deaths need not be reported unless a third party is already making a claim or allegation of defect. Additionally, crashes resulting in injuries are not required to be reported by low-volume manufacturers, and many crashes are not required to be reported at all. Finally, crashes are not reported under EWR soon enough for the agency to identify crashes that merit timely follow up, such as a Special Crash Investigation.

The General Order is specifically focused on the type of information NHTSA needs to identify potential safety defects in ADS and Level 2 ADAS. It requires information specific to the engagement of those systems at the time of the incidents, and it requires this information to be produced in time for the agency to identify those incidents for which follow up is appropriate. This information collection is therefore necessary for the agency to identify incidents, issues, and trends that may reflect a potential safety defect.

Under prior versions of the General Order, NHTSA received reports from multiple entities on the same crash. Because the General Order includes vehicle manufacturers, vehicle operators, and Level 2 ADAS or ADS developers (equipment manufacturers), the agency previously expected that, for certain crashes, multiple entities might be required to submit overlapping incident reports. For example, both a third-party operator and an ADS developer are likely to have notice of a crash involving a vehicle from the developer's test fleet that is being operated by the operator. Likewise, in other circumstances, both an ADS developer and a vehicle manufacturer are likely to receive notice of a crash due to commercial relationships. The new version of the General Order eliminates these duplicative reporting requirements. Under the modified requirements, each reporting entity is independently responsible for reporting incidents that

involved their vehicles or equipment or ensuring that another appropriate reporting entity has reported the incident. This means that when more than one reporting entity has responsibility for a vehicle or its equipment that is covered by this General Order, only one of the reporting entities needs to report the incident, unless they have notice of materially different information. NHTSA's experience with the prior versions of the General Order indicated that the duplicate reports from reporting entities provided little investigative value and sometimes even promoted confusion if it was not immediately clear that a duplicate report referred to an incident for which NHTSA had already learned. Thus, this modification reduces the burden on reporting entities and the agency, while sharpening the information that the agency receives.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The entities required to report information under the General Order include both large and small businesses. Given the nature of the reporting requirements, which are specific to crashes involving property damage, personal injury, or death, NHTSA anticipates that the burden on small businesses with smaller fleets of vehicles will be proportionately smaller than the burden on larger businesses with larger fleets of vehicles. NHTSA previously received public comments suggesting that smaller entities required to report under the General Order require less time to submit individual reports than larger manufacturers, confirming NHTSA's belief that the smaller reporting entities would be reporting for crashes involving vehicles operated in closely-monitored fleets. NHTSA also believes that the benefit of enhancing the agency's ability to identify safety-related defects in these emerging vehicle technologies outweighs the burden to these small businesses.

NHTSA has taken steps to minimize the burden imposed by this information gathering by utilizing electronic means for submissions and by streamlining the reporting requirements from the previous version of the General Order, including extending the reporting requirement for certain reports from one day to five days, eliminating the requirement to submit updated versions of those reports within ten days, eliminating the requirement to submit a report at least every month, eliminating duplicate reporting requirements, and reducing the number of fields required to be reported.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If NHTSA did not conduct this information collection, the agency would be limited in its ability to identify safety-related defects in new and developing technologies that are being tested and deployed on publicly accessible roads throughout the United States. This information collection provides NHTSA with information it needs to carry out its statutory mandate to protect the public against unreasonable risk of accidents occurring because of the design, construction, or performance of a motor vehicle, and against unreasonable risk of death or injury in an accident.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- a. **requiring respondents to report information to the agency more often than quarterly;**
- b. **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- c. **requiring respondents to submit more than an original and two copies of any document;**
- d. **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- e. **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- f. **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- g. **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- h. **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This information collection involves special circumstances that require the information to be collected more often than quarterly. The General Order requires that certain crashes be reported within five calendar days after the reporting entity receives notice of the crash and that other reportable crashes be reported during the month following the month in which the reporting entity receives notice of the crash.

The five-day reports are required for crashes that meet specific criteria that make them of heightened interest in the identification of potential safety defects. For these incidents, the agency needs an initial report within five days to determine whether and, if so, what additional information gathering is appropriate. Absent a report within five days, there is a heightened risk that valuable information could be lost or become otherwise unavailable.

Based on the agency's experience and public comments it received, NHTSA decided to amend the General Order to remove the previous one-day reporting requirement. Multiple commentors had previously submitted comments stating that the requirement in Request No. 1 that an initial report be submitted within one calendar day is unnecessarily burdensome, provides no meaningful benefit to the agency, and increases the likelihood of inaccurate information being submitted to the agency. As part of NHTSA's continuous reassessment of the General Order requirements, the agency determined that requiring certain reports within five days would reduce

the burden on reporting entities, while still providing NHTSA with prompt notice sufficient for it to respond to incidents appropriately.

The agency has retained the two-track approach requiring more serious crashes to be reported on a faster timeline. Other reportable crashes are required to be reported on a monthly basis. The agency needs these reports on a monthly rather than quarterly basis because of the rapidly evolving nature of these advanced technologies (including over-the-air updates) and the serious consequences of an unidentified safety defect.

- 8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency’s notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views.**

NHTSA published a 60-day notice on March 4, 2026, (91 FR 10682) requesting comment on NHTSA’s intention to submit this ICR to OMB for approval. NHTSA received 14 comments, including comments from industry, safety and consumer advocates, state government officials and interested individuals. Most of the comments were expressly supportive of the three-year extension of the General Order but also proposed various changes to the General Order. Specifically, NHTSA received comments regarding the definitions of “notice” and “crash,” the scope of reporting entities, the reporting requirements of the requests, the burden estimates, data publication, and miscellaneous issues.

NHTSA considered all of the comments submitted and will be retaining the General Order in its current form at this time. NHTSA believes it has struck an appropriate balance of who needs to report, when they need to report, and what they need to report to provide NHTSA with sufficient safety-critical information to determine when to investigate further without imposing an undue burden. Most of the changes proposed by commenters would notably alter the scope and nature of the General Order, exceeding the scope of changes that NHTSA intends for this reinstatement.

A summary of the comments and NHTSA’s responses is provided in the 30-day notice the agency published on May 26, 2026.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

This information collection does not involve any payments or gifts to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

This information collection includes instructions for submitting a request for confidentiality under NHTSA’s Confidential Business Information (CBI) regulation, 49 CFR Part 512.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are involved in this information collection.

12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.

To estimate the burden associated with this information collection, NHTSA separated the requirements of the General Order into seven components: (1) incident reports involving Level 2 ADAS that must be submitted within five days; (2) updates to incident reports involving Level 2 ADAS that must be submitted in the following month; (3) incident reports involving ADS that must be submitted within five days; (4) updates to incident reports involving ADS that must be submitted in the following month; (5) initial incident reports involving ADS that must be submitted in the following month; (6) training employees on the requirements; and (7) time to set up an account to submit the reports. The burden associated with categories (6) and (7) are one-time start-up burdens that will be incurred during the proposed extension only for new reporting entities that were added to the General Order during this period. For the 114 reporting entities named in the previous General Order, some of which are no longer subject to the reporting requirements, this burden has already been and was accounted for under the currently approved information collection request.

Estimated Total Annual Number of Respondents: 110

NHTSA estimates that there will be an average of 110 reporting entities during each year of the proposed extension. Currently, there are 106 reporting entities named in the General Order. NHTSA believes that additional reporting entities may be added to the General Order during the proposed extension as new companies enter the market and begin developing and manufacturing ADS and ADAS technology and vehicles equipped with these technologies. NHTSA also believes that some existing reporting entities may be removed from the General Order due to the cessation of operations or market consolidation.

Estimated Total Annual Number of Responses (Reports): 9,574

In the 60-day notice, the agency made various estimates regarding the number of incidents about which the reporting entities would be required to submit reports on an annual basis. Although those estimates were made based on the best information available to the agency at the time, the agency now has additional months of reporting data and history and is therefore able to refine those estimates further.

Level 2 ADAS 5-Day Incident Reports Under Request No. 1

Under the current terms of the General Order, a reporting entity must submit an initial report of a Level 2 ADAS crash meeting specified criteria within five days under Request No. 1. In its 60-day notice, NHTSA estimated that it will receive initial reports of Level 2 ADAS crashes from 43 respondents each year, that each respondent will submit, on average, approximately 86 incident reports meeting the specified criteria per year, and that it will receive, on average, approximately 3,704 Level 2 ADAS incident reports each year. NHTSA explained that this was a high-end estimate that could be refined. For this number, NHTSA averaged the total number of reports by the total number of reporting entities. As in past versions of the General Order, the extent to which particular reporting entities make up this total amount of reporting will likely vary based on the extent their systems are used on public roads. With the benefit of additional reporting history and data, the agency stands by its estimate.

The one-day initial report/ten-day update track has been eliminated in this version of the General Order, so all Level 2 ADAS reports will be submitted under this five-day initial report track, with updates only as required in the following month as described further below.

Level 2 ADAS Updated Incident Reports Under Request No. 3

Under the current terms of the General Order, a reporting entity submitting an initial report of a Level 2 ADAS crash within five days under Request No. 1 is also required to submit an updated report in the month following any month in which the entity receives notice of any materially new or materially different information for specified fields under Request No. 3. In its 60-day notice, NHTSA estimated that 9% of the Level 2 ADAS crash reports would require updated reports. Therefore, NHTSA estimated that approximately 333 updated reports for Level 2 ADAS crashes would be submitted each year.

ADS 5-Day Incident Reports Under Request No. 1

Under the current terms of the General Order, a reporting entity must also submit an initial report of an ADS crash meeting specified criteria within five days under Request No. 1. In its 60-day notice, NHTSA estimated that it would receive approximately 5,425 reports of ADS crashes and, based on NHTSA's review of crash reports already received under previous versions of the General Order, that approximately 2,810 of these would need to be submitted on this five-day track. The remaining reports of ADS crashes would be required to be submitted in the following month as described further below.

ADS Updated Reports Under Request No. 3

Under the current terms of the General Order, a reporting entity submitting an initial report of an ADS crash within five days under Request No. 1 is also required to submit an updated report in the month following any month in which the entity receives notice of any materially new or materially different information for specified fields under Request No. 3, the same as for Level 2 ADAS crashes. In its 60-day notice, NHTSA estimated that 4% of the ADS crashes first reported in a five-day report would require updated reports. Therefore, NHTSA estimated that approximately 112 updated reports for ADS crashes would be submitted each year.

ADS Monthly Incident Reports Under Request No. 2

Under the current terms of the General Order, a reporting entity must submit an initial report of certain ADS crashes that do not meet the criteria for a five-day report in the following month under Request No. 2. In its 60-day notice, NHTSA estimated that it would receive 2,615 of these ADS monthly incident reports per year under Request No. 2.

The total burden and cost estimates set forth below have been revised consistent with these revised annual volume estimates.

Estimated Total Annual Burden Hours: 19,208 hours.

Burden Category 1: Incident reports involving Level 2 ADAS that must be submitted within five days.

To estimate the burden associated with submitting Level 2 ADAS initial crash reports, NHTSA first looked to the category of crashes that must be reported. The General Order only requires reporting of Level 2 ADAS crashes when (1) the crash occurred on a publicly accessible road in the United States (including any of its territories); (2) the Level 2 ADAS was engaged at any time during the period from 30 seconds immediately prior to the commencement of the crash through the conclusion of the crash; and (3) the crash resulted in any individual being transported to a hospital for medical treatment, a fatality, an air bag deployment, or the strike of a vulnerable road user.

Based on the history of reports submitted so far, NHTSA estimated that it will receive an average of approximately 3,704 Level 2 ADAS initial crash reports each year from 43 respondents, or an average of approximately 86 Level 2 ADAS initial crash reports per respondent per year. NHTSA believed this to be a high-end estimate. NHTSA also estimated that it will take respondents approximately 2 hours to compile and submit each Level 2 ADAS initial crash report. Therefore, NHTSA estimates the total annual burden hours for submitting Level 2 ADAS initial crash reports to be 172 hours per respondent (2 hours × 86 crash reports) and 7,396 hours for all respondents (172 hours × 43 respondents).

Burden Category 2: Updates to incident reports involving Level 2 ADAS that must be submitted in the following month.

NHTSA estimated that 9% of the Level 2 ADAS crash reports would require updated reports. Therefore, NHTSA estimated that approximately 333 updated reports for Level 2 ADAS crashes would be submitted each year, or approximately eight updated crash reports for each of the 43 Level 2 ADAS respondents on average. NHTSA estimated that updating the updated crash reports will take approximately 2 hours per report. Therefore, NHTSA estimates that it will take each Level 2 ADAS respondent approximately 16 hours each year to submit Level 2 ADAS crash reports updates (2 hours × 8 crash reports) and 688 hours for all Level 2 ADAS respondents (16 hours × 43 respondents).

Burden Category 3: Incident reports involving ADS that must be submitted within five business days.

To estimate the number of five-day ADS crash reports, NHTSA again first looked to the category of crashes that must be reported. The requirements for when ADS crashes must be

reported within five days are nearly the same as for Level 2 ADAS crashes, except ADS crashes involving a vehicle tow-away are also required to be reported. This difference accounts for the greater degree of oversight warranted for ADS-equipped vehicles, which allow the vehicle automation systems more extensive control authority over the Dynamic Driving Task (DDT). The General Order requires reporting ADS crashes when (1) the crash occurred on a publicly accessible road in the United States (including any of its territories); (2) the ADS was engaged at any time during the period from 30 seconds immediately prior to the commencement of the crash through the conclusion of the crash; and (3) the crash resulted in any individual being transported to a hospital for medical treatment, a fatality, an air bag deployment, vehicle tow-away, or the strike of a vulnerable road user. Based on these criteria and crash reports received in prior versions of the General Order, NHTSA estimated that it will receive responses from 67 respondents reporting ADS crashes each year and expects that there will be approximately 5,425 ADS crashes in a year that manufacturers and operators will be required to report to NHTSA. But only some of these crashes are required to be submitted within five days, while the rest are required to be submitted in the following month.

NHTSA estimated that 2,810 ADS crash reports a year will be submitted within five days, or approximately 42 crash reports from each of the 67 respondents on average. NHTSA estimated that each ADS crash report will take 2 hours to complete and submit. Therefore, NHTSA estimated the burden per respondent to be 84 hours (42 crash reports \times 2 hours) and 5,628 hours for all respondents (84 hours \times 67 respondents).

Burden Category 4: Updates to incident reports involving ADS that must be submitted in the following month.

In addition to submitting information on certain ADS crashes within five days, manufacturers and operators must also submit updated information, if any, by the fifteenth day of the following month. NHTSA estimated that for 4% of ADS crashes first reported in a five-day report, respondents may need to submit updated information. Therefore, NHTSA estimated that 112 monthly reports will include updated crash information (2,810 ADS five-day crashes \times 4%), or approximately 2 reports from each of the 67 respondents. NHTSA estimated that updating the crash reports will take approximately 2 hours per report. Therefore, NHTSA estimated that it will take each respondent approximately 4 hours each year to submit updated ADS crash reports (2 hours \times 2 crash reports) and approximately 268 hours for all ADS respondents (4 hours \times 67 respondents).

Burden Category 5: Initial incident reports involving ADS that must be submitted in the following month.

This information collection requires ADS manufacturers and operators to submit reports of certain incidents—reportable incidents that do not meet any of the criteria for a five-day report—by the fifteenth day of the following month. To estimate the burden of these monthly reports, NHTSA considered the burden of reports of initial ADS crash reports that it has already received. NHTSA estimated there will be 67 ADS vehicle manufacturers and operators that will be required to submit monthly reports each year, for a total of approximately 2,615 monthly reports annually or approximately 39 reports per respondent.

NHTSA estimated that each monthly report submitted by an ADS manufacturer or operator will take 2 hours to submit. NHTSA estimated that there will be at least 67 ADS manufacturers and operators with some manufacturers producing both ADAS and ADS equipped vehicles. Therefore, NHTSA estimated that respondents will spend approximately 5,226 hours annually preparing and submitting monthly reports (67 ADS respondents × 39 monthly reports × 2 hours).

Burden Category 6: Training employees on the reporting requirements.

In addition to the burden associated with preparing and submitting reports, any new reporting entities added to the General Order are also expected to incur burden associated with training employees on the reporting requirements. As explained above, the existing 106 reporting entities named in the General Order will not incur this burden during the requested extension. NHTSA estimates that there will be an average of 4 new reporting entities added to the General Order each year during the proposed extension, that an average of 4 of these new reporting entities will be ADS manufacturers or operators and that an average of 0 of these new reporting entities will be Level 2 ADAS manufacturers. However, NHTSA expects that ADS manufacturers and operators normally monitor all crashes and, therefore, will not need to train personnel on how to respond to this new information collection. Accordingly, NHTSA does not believe this category will measurably increase the burden.

Burden Category 7: Time to set up an account to submit the reports.

NHTSA also estimates that new responding entities added to the General Order during the proposed extension period will need to set up a new account with NHTSA to allow them to submit reports. NHTSA estimates that each of the estimated average of 4 responding entities added to the General Order annually need to set up new accounts with NHTSA. NHTSA estimates that setting up an account will take 0.5 hours. Therefore, NHTSA estimates the total annual burden to be 2 hours.

Total Burden.

NHTSA estimated the total annual burden hours for the seven components of this ICR to be 19,208 hours (7,396 hours for initial five-day Level 2 ADAS reports, 688 hours for updated Level 2 ADAS reports, 5,628 hours for initial five-day ADS reports, 268 hours for updated ADS reports, 5,226 hours for initial ADS monthly reports, 0 hours for training, and 2 hours for setting up new accounts), a reduction from 31,319 hours under the previously approved collection.

Table 1 provides a summary of the estimated burden hours.

Table 1: Burden Estimates

Description of Burden Category (This ICR is for one IC)	Number of Responses	Number of Respondents	Estimated Burden Per Response	Burden Per Respondent	Total Burden Hours
Level 2 ADAS five-day reports, initial Request No. 1	3,704	43	2 hours	172 hours	7,396 hours
Level 2 ADAS five-day reports, monthly update Request No. 3	333	43	2 hours	16 hours	688 hours
ADS five-day reports, initial Request No. 1	2,810	67	2 hours	84 hours	5,628 hours
ADS five-day reports, monthly update Request No. 3	112	67	2 hours	4 hours	268 hours
ADS monthly reports, initial Request No. 2	2,615	67	2 hours	78 hours	5,226 hours
Training	0	4	0 hours	0 hours	0 hours
Setting Up Account	0	4	0.5 hours	0.5 hours	2 hours

Total for ICR: Level 2 ADAS/ADS Incident Reporting	9,574				19,208 hours
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To calculate the labor cost associated with preparing and submitting crash reports and reports, training, and setting up new accounts, NHTSA looked at wage estimates for the type of personnel involved with these activities. NHTSA estimated the total labor costs associated with these burden hours by looking at the average wages for architectural and engineering managers in the motor vehicle manufacturing industry (Architectural and Engineering Managers, Standard Occupational Classification No. 11-9041), Engineers (17-2000), Lawyers (23-1011), and Computer and Information System Managers (11-3021). NHTSA estimates the total labor costs associated with these burden hours by looking at the seventy-fifth percentile wage for architectural and engineering managers, computer and information systems managers, and engineers in the motor vehicle manufacturing industry and the seventy-fifth percentile wage for lawyers.⁷ The Bureau of Labor Statistics estimates that private industry workers' wages represent 70.2% of total labor compensation costs.⁸ Therefore, NHTSA has weighted the wages accordingly, as shown in Table 2, and, based on the estimates of each role's time spent per report, calculates the average weighted hourly wage to be \$126.29.

Table 2: Hourly Labor Costs

Labor Category	Wage	Hourly Labor Cost
Computer and Information System Managers (11-13021) in the Motor Vehicle Manufacturing Industry (75th percentile)	\$115.00	\$163.82
Architectural and Engineering Managers (11-9041) in the Motor Vehicle Manufacturing Industry (75th percentile)	\$104.50	\$148.86
Engineers (17-2000) in the Motor Vehicle Manufacturing Industry (75th percentile)	\$65.81	\$93.75
Lawyers (23-1011) in the Motor Vehicle Manufacturing Industry (75th percentile)	\$115.00	\$163.82

Accordingly, NHTSA estimates the total labor cost associated with the 19,208 annual burden hours to be \$2,425,778.32.

⁷ See May 2024 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 336100 - Motor Vehicle Manufacturing, available at https://www.bls.gov/oes/current/naics4_336100.htm; May 2024 National Occupational Employment and Wage Estimates, available at https://www.bls.gov/oes/current/oes_nat.htm. Note that the seventy-fifth percentile wage for lawyers and computer and information systems managers were not provided by the Bureau of Labor Statistics because they are equal to or greater than \$115 per hour. Without additional information, NHTSA used \$115 per hour for those wages in its calculations.

⁸ See Table 1. Employer Costs for Employee Compensation by ownership (June 2025), available at <https://www.bls.gov/news.release/ecec.t01.htm>.

Table 3 provides a summary of the estimated labor costs, resulting in a modestly different estimated annual labor cost due to rounding and excluding the time spent setting up new accounts.

Table 3: Labor Cost Estimates

Description of Information Collection Component	Total Hours and Labor Cost Per Response for Computer and Information System Managers (11-13021)	Total Hours and Labor Cost Per Response for Architectural and Engineering Managers (11-9041)	Total Hours and Labor Cost Per Response for Engineers (17-2000)	Total Hours and Labor Cost Per Response for Lawyers (23-1011)	Total Labor Cost per Response	Total Labor Cost
Level 2 ADAS five-day reports, initial Request No. 1	20 minutes \$54.61	20 minutes \$49.62	60 minutes \$93.75	20 minutes \$54.61	\$252.59	\$935,593.36
Level 2 ADAS five-day reports, monthly update Request No. 3	20 minutes \$54.61	20 minutes \$49.62	60 minutes \$93.75	20 minutes \$54.61	\$252.59	\$84,112.47
ADS five-day reports, initial Request No. 1	20 minutes \$54.61	20 minutes \$49.62	60 minutes \$93.75	20 minutes \$54.61	\$252.59	\$709,777.90
ADS five-day reports, monthly update Request No. 3	20 minutes \$54.61	20 minutes \$49.62	60 minutes \$93.75	20 minutes \$54.61	\$252.59	\$28,290.08
ADS monthly reports, initial Request No. 2	20 minutes \$54.61	20 minutes \$49.62	60 minutes \$93.75	20 minutes \$54.61	\$252.59	\$660,522.85
Training	0 hours \$0	0 hours \$0	0 hours \$0	0 hours \$0	\$0	\$0
Setting Up Account	0.5 hours \$81.91	0 hours \$0	0 hours \$0	0 hours \$0	\$81.91	\$163.82
Total						\$2,418,460.48

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden already reflected in the response provided in question 12.

NHTSA is not aware of any additional costs manufacturers will incur nor does NHTSA have a basis for estimating any such costs without additional information. NHTSA believes manufacturers will be able to comply with requirements by only incurring labor costs associated with the burden hours.

14. Provide estimates of annualized costs to the Federal government. Provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The annualized costs to the Federal government involve costs associated with reviewing the ADS and Level 2 ADAS crash reports. This burden includes the time NHTSA personnel spend reviewing ADS and Level 2 ADAS crash reports to determine which incidents warrant further investigations. Burden beyond the initial time for screening is not included as costs associated with this information collection.

NHTSA estimates the cost of reviewing reports based on review time spent by a NHTSA analyst at a GS-13 salary. The hourly wage of a GS-13-5 employee is \$66.14.⁹ To estimate total compensation costs, NHTSA used the Bureau of Labor Statistics' estimate that wages and salary only represent 61.5% of total employee compensation cost for State and local employees,¹⁰ which brings the total hourly cost for this employee's time to \$107.54. Review time varies significantly, with most incident reviews taking about 15 minutes. Other incidents, significantly more time to review. NHTSA estimates that 75% of all reports will require 15 minutes to review. For the remaining 25% of incident reports, NHTSA estimates that the review will take, on average, 2 hours to review. Assuming that NHTSA receives a combined 9,574 reports (4,037 Level 2 ADAS reports and 5,537 ADS reports), the agency estimates the associated time required for review to be approximately 6,582 hours $((4,037 \text{ crash reports} \times 0.75 \times 0.25 \text{ hours}) + (4,037 \text{ crash reports} \times 0.25 \times 2 \text{ hours}) + (5,537 \text{ crash reports} \times 0.75 \times 0.25 \text{ hours}) + (5,537 \text{ crash reports} \times 0.25 \times 2 \text{ hours}))$, with an associated labor cost of \$707,828.30 (6,582 hours \times \$107.54 per hour).

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be entire burden cost and number of burden hours reported in response to questions 12 and 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.

On March 6, 2023, OMB approved NHTSA's three-year extension of its information collection for the previous version of the General Order (OMB Control No. 2127-0754). NHTSA is seeking

⁹ 2026 General Schedule hourly rate with Washington DC locality pay: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB_h.pdf.

¹⁰ Employer Costs for Employee Compensation (June 2025), <https://www.bls.gov/news.release/eccec.t01.htm>.

an extension of this information collection with modifications, namely a significant reduction in burden. The reduction in estimates is based on the streamlining of this version of the General Order, including removal and consolidation of some of the burden categories in previous versions, and NHTSA's years of experience in receiving reports under previous versions of the General Order. The change in burden hours represents a program change resulting in a decrease in burden hours of 30,220.5 hours.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions as applicable.

NHTSA intends to continue making the summary crash information it receives under the General Order publicly available. NHTSA will process the information it receives under the General Order and then will make it publicly available on NHTSA.gov. NHTSA is not permitted under existing law to publicly disclose certain information, including personally identifiable information (PII) (such as the identity of individuals involved in crashes) and confidential business information.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Approval is not sought to not display the expiration date for OMB approval.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.¹¹

There are no exceptions.

The following Paperwork Reduction Act statement will appear on the electronic form:

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. NHTSA estimates that completing and submitting this form will take approximately 30 minutes. The OMB Control Number for this information collection is 2127-0754. Expires: **DATE**.

¹¹ Specifically explain how the agency display the OMB control number and expiration date and will inform potential respondents of the information required under 5 CFR 1320.8(b)(3); the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

This information collection and Standing General Order 2021-01 requires manufacturers and operators of vehicles equipped with ADS or Level 2 ADAS to report certain crashes to NHTSA. The data will help the agency understand the extent to which incidents are potentially a result of safety defects, including whether manufacturers have failed to appropriately design their systems based on their foreseeable misuse.