

April 28, 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; Incident Reporting for Automated Driving Systems (ADS) and Level 2 Advanced Driver Assistance Systems (ADAS).
Docket No. NHTSA-2026-0529.**

Dear Administrator Morrison:

The Insurance Institute for Highway Safety (IIHS) appreciates the opportunity to comment on the National Highway Traffic Safety Administration's (NHTSA's) data collection efforts on vehicles equipped with driving automation involved in crashes under its Standing General Order (SGO). The SGO is currently the only national-crash-reporting requirement for vehicles equipped with driving automation, especially SAE Level 4 automation (L4 vehicles), and it provides a unified data system not subject to needless state-by-state variation. IIHS encourages NHTSA to begin a process that would more closely align the SGO data with other crash data systems and require standardized reporting of vehicle miles traveled (VMT). These recommendations were derived from an upcoming IIHS study that used the SGO data to compare the crash experience of L4 vehicles on public roads with that of human drivers. Improving data collection on crashes and exposure of driving automation used on public roads is an opportunity to more efficiently conduct research studies and—per the original purpose of the SGO—identify defects.

Since the SGO collects data on crashes, it should be designed analogously to other crash databases maintained by NHTSA including the Fatality Analysis Reporting System (FARS) and the Crash Report Sampling System (CRSS), although it can be simpler than FARS and CRSS in terms of data structure complexity and number of data elements. This would allow analyses of SGO data to be performed quicker and more accurately, and a good rubric for that level of data quality is whether a researcher can download the latest dataset, run a program, and see usable results. Currently, this is impossible with SGO data because of the many duplicative records (often containing different information) and the large number of very low-severity events that are not comparable with the crashes human drivers report to police. The IIHS study excluded 25% of the unique SGO records investigated because the incidents did not occur on a public road, involved the L4 vehicle being operated manually, or were not a crash in the first place; 78% of the remaining crashes were deemed less severe than what humans typically report to police and excluded from further analyses. The third-amended SGO set some minimum reporting criteria for property damage crashes, but it is unclear if the resulting data are directly aligned with police-reported crash data.

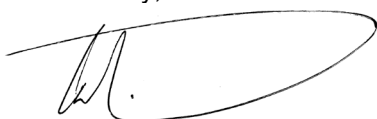
In making any major changes to this important data collection system, NHTSA should seek public comment to gain additional insights from researchers and other stakeholders, and to ensure that any such changes do not become overly burdensome to those required to report crashes. Overall reporting burden is a function of both the complexity of reporting a crash and the number of crashes that must be reported. Aligning reporting criteria with what human drivers report to police would substantially reduce the number of reportable crashes. If less severe crashes are of interest for defect investigation, a streamlined reporting procedure could be used for these.

Some specific recommendations based on the IIHS study are provided below. There are likely other ways to improve data collection, content, and structure that could be identified through public comment.

- Require standardized reporting of monthly VMT by location fleetwide.
- Identify the primary record for each crash incident or, ideally, curate the database so that it contains one record per crash incident with the most up-to-date information for all data elements.
- Disallow redactions of entire narratives and reduce other redactions through clear guidance. For example, it is unclear why road names are redacted when other crash databases include them.
- Continue to include narratives in future versions of the database. While increasingly unsustainable as a tool for studies of the full SGO database, narratives are still useful for more targeted studies and for defect identification.
- Ensure consistency of index variables (report_id, same_incident_id, same_vehicle_id) across SGO database releases and ensure these are never missing.
- Include a variable indicating whether the crash incident was submitted under SGO Request 1 or Request 2, as the former more closely aligns with police-reporting thresholds than the latter.
- Code types of crash damage (e.g., scratched bumper, dented body panel, structural intrusion, damaged L4 sensor, etc.) to help infer severity and alignment with police-reported human data.
- Provide guidance that damage reported in narratives should be more specific than “minor damage.” In some cases, it seemed obvious that this meant a scratched bumper, and other times it seemed like it meant something more serious like a broken rear windshield.
- Code crash type at the vehicle level using the acc_type variable coding scheme in FARS and CRSS. Ideally, this would be done at a reporting level rather than from narratives.
- Code the specific SAE level of automation that was in use immediately before impact, not just the within-30-seconds inclusion criteria. This would allow identification of cases in which a vehicle was being driven manually at the time of impact. Moreover, the automation_system_engaged variable should also identify the specific level because L3 and L4 have very different functionalities (currently the variable groups L3–L5).
- Distinguish in the driver/operator type variable between remote operation (directly manipulating vehicle control) and remote assistance and define these carefully.
- Use KABCO coding for injury severity to improve alignment with police-reported data. While SGO levels appear similar, it is not clear whether they are based on the KABCO guidance.

In summary, IIHS supports NHTSA in its efforts to collect and maintain a national data system of crashes involving driving automation technology on our nation’s roads. This is an important tool for evaluating the real-world impact of these technologies, identifying defects, and comparing the safety of autonomous vehicles with human-driven vehicles. As VMT increases and L4 vehicles are deployed in new cities, it is important to enable monitoring and evaluation that is faster and more accurate through careful improvement of this important data system.

Sincerely,



Eric Teoh
Director of Statistical Services