



May 4, 2026

Docket Management Facility, M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE, West Building, Room W12-140
Washington, DC 20590-0001

RE: Comments of the American Association of Motor Vehicle Administrators on the Agency Information Collection Activities; Incident Reporting for Automated Driving Systems (ADS) and Level 2 Advanced Driver Assistance Systems (ADAS) [Docket No. **NHTSA-2026-0529** / OMB Control No. 2127-0754]

The American Association of Motor Vehicle Administrators (AAMVA) represents the motor vehicle administrators of the United States and Canada, whose members administer driver licensing, vehicle registration and titling, and motor vehicle safety enforcement on behalf of the public. State motor vehicle agencies interact with ADS-equipped and ADAS-equipped vehicles every day — in crash investigations, roadside enforcement, and emergency response.

AAMVA supports extending OMB Control No. 2127-0754 for three years. Standing General Order 2021-01 (SGO 2021-01) is the primary structured mechanism by which NHTSA receives timely, mandatory incident data on ADS and Level 2 ADAS performance in the field. Its continuation is not merely administratively appropriate — it is the only such mechanism currently operative. Given NHTSA authority to amend the SGO, AAMVA provides comments as described in the ICR to the effectiveness of NHTSA to perform oversight functions related to ADS-equipped vehicles which may extend beyond the normal limitations of an ICR.

Importance of Data Collected

Changes to the administration of data inputs are not uniform in their safety effect. Some expand safety coverage; others narrow the scope of reportable crashes.

The addition of vehicle tow-away as a five-day ADS reporting trigger is a genuine expansion of the collection's safety coverage and is fully supported. Tow-away is a reliable severity proxy that does not depend on whether occupants were present or transported — a gap that matters as ADS-dedicated vehicles carrying no human occupants become more prevalent. This change appropriately reflects the greater oversight warranted for vehicles where the ADS performs the full DDT.

Eliminating mandatory null monthly reports, removing fixed-interval update requirements, and consolidating duplicate reports from entities sharing identical information are straightforward burden reductions with minimal safety cost. AAMVA defers to NHTSA on the utility of eliminating these requirements.

Under the SGO, any ADS crash not meeting the five-day criteria required a monthly report — no minimum damage threshold, no at-fault filter. Under the modified SGO, a monthly report is required only if property damage exceeds \$1,000 and the subject ADS vehicle was either the sole vehicle involved or the striking party. This means:

A crash in which an ADS vehicle was struck by another vehicle — and where the ADS failed to detect the approaching vehicle and execute an evasive maneuver — may fall entirely outside the reporting universe if property damage is below threshold.

Low-speed ADS failures that do not produce significant property damage but do reflect systematic detection or response deficiencies that will go unreported under the modified framework.

The at-fault filter implicitly assumes that crashes where the ADS vehicle was not the primary at-fault party are not safety signals. An ADS that fails to avoid a foreseeable collision — even one initiated by another party — may be exhibiting a defect in its object detection, event response, or DDT execution that could yield important safety benefits in terms of long-term detection and remediation of safety issues. The value of this collection lies in aggregate pattern detection — and patterns of low-severity ADS failures at specific thresholds, road types, or conditions can be precisely the leading indicators of systemic defects.

Potential for Additional Inclusion on ODD Operation Within Confined Limits

Within the scope of this ICR, AAMVA recommends one data field enhancement to Form 1612 that would materially improve the collection's defect-detection utility: an indication of whether the ADS was operating within or outside its Operational Design Domain (ODD) at the time of the crash.

This field is directly relevant to NHTSA's core purpose in collecting this data. An ADS operating outside its ODD when a crash occurs — in weather, geography, or road conditions for which it was not designed — presents a qualitatively different safety signal than a crash within a validated domain. ODD exceedance is probative of whether a crash reflects a design defect, a deployment decision, or an operator failure. It is information manufacturers possess and can be expected to report.

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