January 20, 2026

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

Subject: Comments on Notice: Agency Information Collection Activities; Proposals, Submissions, and Approvals: Fatality Analysis Reporting System and Non-Traffic Surveillance (Docket No. NHTSA-2025-0721)

Dear Mr. Morrison:

ITE—A Community of Transportation Professionals (ITE)is grateful for the opportunity to provide comments on the National Highway Traffic Safety Administration's (NHTSA) *Notice on Agency Information Collection Activities; Proposals, Submissions, and Approvals: Fatality Analysis Reporting System and Non-Traffic Surveillance*, published in the Federal Register on November 18, 2025.

Founded in 1930, ITE is an international membership association of transportation professionals who work to improve safety and mobility for all transportation system users and help build smart and livable communities. Through its products and services, ITE promotes professional development and career advancement for its members, supports and encourages education, identifies necessary research, develops technical resources including standards and recommended practices, develops public awareness programs, and serves as a conduit for the exchange of professional information. Through meetings, seminars, publications, and a network of more than 18,000 members working in 78 countries, ITE connects members to a world of ideas, people, and resources.

ITE believes that the Fatality Analysis Reporting System (FARS) is foundational to data-driven, evidence-based road safety, as it directly supports national strategies to reduce road fatalities. FARS serves as the empirical backbone of national safety plans and peer-reviewed evaluations. As NHTSA considers the extension of this currently approved information collection, ITE's recommendations focus on four key areas:

ITE—A Community of Transportation Professionals
1627 Eye Street, NW, Suite 550, Washington, DC 20006 USA
Tel 202-785-0060 | **Web** www.ite.org

1) Importance of FARS
2) Contribution of FARS to National Fatal Crash Reduction Efforts
3) Evidence of Demonstrated Impact
4) Opportunities to Enhance the Value of FARS

These areas reflect ITE's commitment to creating a safer, more efficient, and more collaborative transportation system that serves all users and communities effectively. The sections below summarize ITE's specific recommendations.

1) Importance of FARS

- **Provides a complete, comparable census of fatal crashes in the U.S.** FARS is a standardized, nationwide census of every fatal motor vehicle traffic crash that occurred on our public roadways since 1975. Each case includes over 100 coded elements spanning roadway, crash, vehicle, and person-level data, enabling a comprehensive, consistent, and comparable analysis across time and states. FARS is therefore uniquely suited for causal evaluation and trend monitoring. Public access via the FARS Encyclopedia and raw files ensures transparency and reproducibility of data-driven safety analysis.
- **Provides a national benchmark for comparing state safety performance.** FARS helps identify states with elevated fatality rates or specific areas of concern (e.g., young drivers, intersections, and lane departures), enabling targeted support and funding, while also highlighting high-performing states whose approaches may serve as models for others.
- **Data backbone of safety policy.** USDOT's National Roadway Safety Strategy (NRSS) depends on FARS to diagnose risk and track outcomes across the Safe System pillars (safer people, roads, vehicles, speeds, and post-crash care). Federal and state safety programs use FARS to set targets and prove effectiveness. FARS is critical in setting evidence-based priorities at national scale.
- **Enables timely detection of evolving risks.** FARS helps identify and monitor trends in specific crash types and patterns (e.g., pedestrian fatalities, alcohol-impaired fatal crashes, etc.), revealing where and when fatal crashes occur and helping identify countermeasures that work, such as speed management, visibility, separation, and impaired driving prevention.
- **Supports evaluations that change laws and save lives.** Decades of FARS-based evaluations quantified the benefits of several safety interventions such as seat belt use, universal motorcycle helmet laws, ".08 BAC" limits, etc., through

evidence that influenced legislation, enforcement practices, and technology roadmaps.

2) Contribution of FARS to National Fatal Crash Reduction Efforts

- **Powers the NRSS and Safe System implementation.** NRSS progress reporting relies on FARS to track traffic fatalities by user type, behavior, and context, informing federal actions (e.g., speed management, safer vehicles with crash avoidance and pedestrian Automatic Emergency Braking (AEB), and impaired driving prevention) and enabling states to align with the same metrics.
- **Underwrites state DOTs' Strategic Highway Safety Plans (SHSPs).** Various SHSPs integrate FARS into emphasis areas, performance dashboards, and investment choices (e.g., roundabout first policy, speed safety cameras in work zones). Several SHSPs also use FARS to set targets and to prioritize contributing factors (e.g., speed, inattention, intersections, lane departure, impairment, and unbelted occupants). FARS data is one of the primary data sources used by state DOTs in developing their SHSPs.
- **Quantifies the burden and the payoff of prevention.** NHTSA's Economic and Societal Impact of Crashes, 2019 (which explicitly uses FARS) found $340B in economic costs and nearly $1.4T in total societal harm in a single year, which clarifies the stakes and provides a baseline against which to measure benefits from interventions.

3) Evidence of Demonstrated Impact

- **Seat belts:** FARS-based analyses reconfirm seat belt effectiveness (~45% fatality risk reduction in cars; ~60% in light trucks), supporting primary-enforcement laws and reminder technologies. In 2019 alone, seat belts prevented $93B in injury-related economic costs; from 1975–2019, seat belt use saved 404,000 lives and averted $17.8T in societal harm.
- **.08 BAC per se laws:** State time series using FARS (1982–2014) show significant reductions in drinking-driver fatal crash ratios after .08 adoption across most jurisdictions, supporting nationwide diffusion and sustained enforcement.
- **Universal motorcycle helmet laws:** Using FARS, CDC found far fewer unhelmeted deaths in universal-law states and fourfold higher per-motorcycle societal cost savings ($725 vs. $198), strengthening legislative/advocacy efforts.
- **Pedestrian safety and technology:** National pedestrian assessments by the Insurance Institute for Highway Safety (IIHS) and the Governors Highway Safety Association (GHSA), grounded in FARS, point to nighttime risk, lack of sidewalks,

and the growing share of light trucks in pedestrian deaths. Those findings guide lighting, grade/directional separation, crossing protection, vehicle technology adoption, and targeted enforcement. Further, IIHS shows pedestrian AEB reduces pedestrian crashes by ~27%, accelerating original equipment manufacturer (OEM) adoption and procurement guidance.

4) Opportunities to Enhance the Value of FARS

- **Sustain and modernize the data pipeline.** Continue investing in coding manuals (e.g., the 2024 FARS Analytical User's Manual), state partnerships, and data validation to ensure timely, high-fidelity variables that support Safe System analytics (e.g., speed context, pedestrian facilities, and vehicle safety technology presence).
- **Strengthen linkages with CRSS and state systems.** Preserve FARS as the "gold standard" for fatal crash data while enabling seamless linkage with CRSS, EMS, hospital, and roadway inventory datasets, allowing safety professionals to quantify not only where fatalities occur, but why they occur and which layered countermeasures deliver the greatest safety benefit.
- **Accelerate translational products.** Expand national and state dashboards and benchmarking tools so practitioners can quickly identify systemic risks, compare performance, and evaluate countermeasures using consistent, decision-ready metrics.
- **Embed economic valuation by default.** Pair FARS outputs with USDOT's Value of a Statistical Life (VSL) and the 2019 cost framework so every federal, state, and local safety decision includes a clear, comparable benefit–cost narrative for policymakers and stakeholders.

ITE recognizes that FARS is not without limitations, particularly the time required for NHTSA to compile, validate, and release each annual dataset, which can take two to three years. Other data sources, such as state police-reported crash files, emerging telematics data, and near-real-time safety analytics tools, can provide more immediate insights into crash trends and risky behaviors, and many transportation professionals rely on these sources for short-term operational and programmatic decisions. However, no other dataset provides the same nationally consistent, rigorously validated, and longitudinal view of fatal crashes as FARS. FARS remains indispensable for understanding systemic risk, evaluating the effectiveness of countermeasures, supporting evidence-based policy and investment decisions, and advancing the Safe System approach.

ITE supports efforts to modernize and streamline FARS to improve timeliness and usability, provided that any changes preserve data accuracy, integrity, and year-to-year comparability. ITE further encourages NHTSA to engage the transportation community through transparent public review and stakeholder input on any substantial changes to FARS, ensuring that the system continues to meet the needs of practitioners, researchers, policymakers, and safety partners nationwide.

FARS is indispensable to the nation's road safety mission, providing trusted evidence that informs laws, design decisions, enforcement priorities, technology adoption, and public health messaging. FARS enables rigorous analysis of the interactions and contributing factors behind roadway crashes, helping target national safety programs for maximum effectiveness. It also documents the strong economic return on safety investments, demonstrating that safety improvements are among the highest-value uses of public transportation funds. Continuing to resource, modernize, and integrate FARS is one of the most cost-effective actions available to save lives and reduce the approximately $340 billion in annual economic losses and $1.4 trillion in societal harm borne by Americans. Therefore, ITE urges NHTSA to extend this currently approved information collection.

We appreciate the opportunity to contribute to this notice and stand ready to collaborate with NHTSA and other stakeholders to advance our shared road safety priorities. If you have any questions about these comments or recommendations, please contact Matthew Hardy, Ph.D., Deputy Executive Director and Chief Technical Officer, at (703) 868-7154 or mhardy@ite.org.

Sincerely,

Stephen R. Kuciemba
ITE Executive Director & CEO