



August 19, 2024

The Honorable Jennifer Homendy  
Chair  
National Transportation Safety Board  
490 L'Enfant Plaza East, SW  
Washington, DC 20594

Dear Chair Homendy:

This letter addresses several safety recommendations issued by the National Transportation Safety Board (NTSB) to the National Highway Traffic Safety Administration (NHTSA) regarding Model Minimum Uniform Crash Criteria (MMUCC) data elements and light vehicle forward collision avoidance systems.

NHTSA's responses to the related recommendations are discussed below.

**NTSB Recommendation and Requested Designation:**

**H-17-21:** Work with the Governors Highway Safety Association (GHSA), the International Association of Chiefs of Police (IACP), and the National Sheriffs' Association (NSA) to develop and implement a program to increase the adoption of speeding-related MMUCC Guideline data elements and improve consistency in reporting of speeding-related crashes.

**NHTSA Action:**

The MMUCC is a voluntary guideline that represents a minimum, standardized set of data variables to describe motor vehicle traffic crashes and was developed to encourage greater data uniformity among the States.<sup>1</sup> On January 4, 2024, NHTSA released the 6th edition of the MMUCC, which incorporated changes to the speeding-related data element (D5), including a new selection hierarchy and definitions to clarify how the selections should be applied. Data elements, attributes, definitions, and guidance in the MMUCC have been harmonized with NHTSA's Crash Report Sampling System (CRSS), Crash Investigation Sampling System (CISS), and Fatality Analysis Reporting System (FARS).

NHTSA also created a MMUCC 6th Edition Information Exchange Package Documentation (IEPD).<sup>2</sup> The IEPD outlines the rules and standards governing the exchange of information between systems. Its purpose is to support consistency and interoperability in data sharing. To further improve interoperability, NHTSA convened a MMUCC Advisory Committee comprised of 25 members from law enforcement and state and local governments acting in their official

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<sup>1</sup> <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813525>

<sup>2</sup> <https://www.nhtsa.gov/file-downloads?p=nhtsa/downloads/MMUCC/>

capacity as government agency stakeholders in the collection, management, and analysis of crash data. The purpose of the MMUCC Advisory Committee was to review the draft MMUCC 6th edition and exchange information to further develop and refine the MMUCC guideline.

The guiding paradigm of the U.S. Department of Transportation's (DOT) National Roadway Safety Strategy (NRSS) is the Safe System Approach, which includes "safer speeds" among the five elements.<sup>3</sup> Supporting the NRSS as Allies in Action are nearly 200 stakeholders including GHSA, IACP, NSA, and the National Organization of Black Law Enforcement Executives.<sup>4</sup> NHTSA will continue to educate stakeholders, conduct research and development activities, and provide resources as appropriate to assist and support these organizations in using MMUCC as a guideline to identify behavioral concerns and to accurately collect data on speeding-related crashes.

NHTSA requests that recommendation H-17-21 be classified as **Closed, Acceptable Response**.

**H-22-26:** Work with GHSA to ensure that revisions to the MMUCC include data elements for electric scooters and electric bicycles.

**NHTSA Action:**

The 6th edition of the MMUCC incorporated substantive changes to the program and updated or added to the non-motorist data elements. One of the new data elements, "NM9, Non-Motorist Device Type," enables law enforcement to properly characterize the presence of electric bicycles, electric scooters, or other motorized or partially motorized personal conveyances involved in a crash.

Additionally, this edition culminated a four-year collaboration with DOT modal partners, states, and subject matter experts to redesign the data elements and harmonize the MMUCC with NHTSA's CRSS, CISS, and FARS. The GHSA was a member of the newly chartered MMUCC Advisory Committee that informed these revisions.

NHTSA requests that recommendation H-22-26 be classified as **Closed, Acceptable Response**.

**H-15-04:** Develop and apply testing protocols to assess the performance of forward collision avoidance systems in passenger vehicles at various velocities, including high speed and high velocity-differential.

**NHTSA Action:**

On May 9, 2024, NHTSA issued a final rule that requires all light vehicles be equipped with forward collision warning and automatic emergency braking (AEB) technology.<sup>5</sup> An AEB system uses various sensor technologies and sub-systems that work together to detect when the vehicle is in a crash-imminent situation, automatically apply the vehicle brakes if the driver has not done so, or apply more braking force to supplement the driver's braking. AEB systems reduce the frequency and severity of vehicle and pedestrian collisions. This rule specifies that an

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<sup>3</sup> <https://www.transportation.gov/NRSS/SaferSpeeds>

<sup>4</sup> <https://www.transportation.gov/nrss/allies-in-action>

<sup>5</sup> <https://www.federalregister.gov/automatic-emergency-braking-systems-for-light-vehicles>

AEB system must detect and react to an imminent crash with a lead vehicle. The rule's test procedures also include high-speed performance requirements. Specifically, crash avoidance is required at speeds up to 100 km/h (62 mph) when manual braking is applied and up to 80 km/h (50 mph) when no manual braking is applied. This final rule is estimated to prevent 362 fatalities and mitigate 24,321 non-fatal injuries a year, and it requires manufacturers' compliance with all provisions of the rule by September 1, 2029.

NHTSA requests that recommendation H-15-04 be classified as **Closed, Acceptable Response**.

**H-18-42:** Develop performance test criteria for manufacturers to use in evaluating the extent to which automated pedestrian safety systems in light vehicles will prevent or mitigate pedestrian injury.

**NHTSA Action:**

NHTSA's final rule to require forward collision warning and automatic emergency braking technology also requires all light vehicles be equipped with pedestrian automatic emergency braking technology. Pedestrian AEB systems reduce the frequency and severity of vehicle and pedestrian collisions. For pedestrian avoidance, performance under both daylight and darkness conditions is required since more than three-fourths of all pedestrian fatalities occur in conditions other than daylight. Crash avoidance is required for pedestrian testing at top testing speeds between 50 km/h (31 mph) and 65 km/h (40 mph). The final rule requires manufacturers' compliance with all provisions of the rule by September 1, 2029.

NHTSA requests that recommendation H-18-42 be classified as **Closed, Acceptable Response**.

If you have any questions, or require additional information, please contact Darren Hall, Office of Governmental Affairs, Policy and Strategic Planning, at 202-650-7620.

Sincerely,



Sophie Shulman  
Deputy Administrator