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**Comments on 81 Federal Register 23549, April 21, 2016, Proposed
Amendments to the Model Minimum Uniform Crash Criteria**

The Center for Auto Safety, an independent organization dedicated to reducing the number and consequences of motor vehicle crashes, generally concurs that the proposed changes to the Model Minimum Uniform Crash Criteria – if broadly implemented – will improve the detail provided in Police Crash Reports and will therefore provide key data that can be used to improve motor vehicle safety. One omission is a data element that describes whether there has been any failure of seats and seat backs, particularly in rear impact crashes, because of the potential that such failures will contribute to occupant injury.

The proposed changes to the MMUCC will far from fully address the need and opportunity to make a more fundamental improvement in crash data. The need for substantially more comprehensive and accurate information from police crash reporting comes from the following facts:

- Crash fatalities are currently increasing after a period of significant improvement;
- Vehicle technology is undergoing major changes with new materials, designs, and manufacturing techniques; and

- Substantially more rigorous fuel economy requirements will almost certainly result in lighter vehicles, alternative energy storage technologies, and other innovations.

We are on record as advocating an opportunity to comprehensively update the way motor vehicle crashes are investigated and reported by state and local police officials. Specifically, technologies developed since the original MMUCC were adopted would permit dramatically improved police crash reports. These include the following:

- Use of dedicated laptop or tablet computers for direct input into electronic versions of Police Crash Reports;
- Digital photography of the scene and vehicles taken according to specific protocols;
- The use of satellite maps obtained over the Internet as a basis for scene diagrams and of drawing tools to indicate vehicle trajectories, impact points, final rest points, and other key elements of the scene;
- Simplified downloading of key data (pre-crash speed, pre-crash braking, restraint use) from the crash recorders that are in virtually all vehicles on the road today;
- The use of artificial intelligence software to estimate the nature and severity of a crash and to provide a more detailed description of the nature and severity of injuries than is currently provided by the KABCO scale; and
- The use of internet communications to provide rapid transfer of Police Crash Reports into state data bases.

We realize that these proposals are beyond the scope of the current action, but it is critical that action be initiated to bring police crash investigation and reporting into the twenty-first century. The result will provide the basis for the next major initiative to further reduce motor vehicle crashes and crash injuries. We therefore strongly recommend an addendum to the current proposal outlining how up-to-date technologies can provide the information that will be critical to addressing these challenges, and proposing a strategy and timetable for implementing them.

Sincerely,

/s/

Clarence M. Ditlow
Director

/s/

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Chief Scientist