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

AAMVA Comments on “Draft Model Minimum Uniform Crash Criteria Guidelines, Sixth Edition [Docket No: DOT-NHTSA-2023-0002]

The American Association of Motor Vehicle Administrators (AAMVA) thanks the National Highway Traffic Safety Administration for the opportunity to comment on its updated Model Minimum Uniform Crash Criteria (MMUCC) which provides States with a guideline for describing crashes involving motor vehicles in transport. The data collected from these crashes inform and improve traffic safety nationwide and serve as essential insight into the issues most contributing to violence on the nation’s roadways. AAMVA offers the following comments in response to NHTSA’s Sixth Edition of the MMUCC:

In General

Primary among AAMVA’s comments is protecting the safety of the roadside law enforcement officers that serve as the crash scene investigators that contribute to the sufficiency and accuracy of the MMUCC. AAMVA urges NHTSA to consider the safety of the officer at roadside and ensure that they are not exposed to the crash scene unnecessarily nor subjected to high traffic, high-risk environments any longer than absolutely necessary. AAMVA stresses that it is inappropriate to mandate reporting from the scene of a crash as it can result in officers providing inaccurate or incomplete data under stressed conditions. The location of the data reporting should be inconsequential to the result, and often full crash data can not be known through the duration of a protected crash scene. Routine additional data coalesces throughout the duration of a full crash investigation and may take place from numerous locations.

The comments below refer to the corresponding specific sections of the Sixth Edition of the MMUCC

2.5 – Each Element Format

The maximum number of characters in an elements data is not listed. AAMVA poses the question to NHTSA about whether the agency should consider whether or not implementers have ensured they have reserved sufficient space on forms and on databases. For example, how long should a driver’s license number be? While AAMVA reserves the field accommodation at 25 characters, should there be considerations about whether all implementers are ensuring there is room for growth? Additionally, AAMVA recommends NHTSA consider whether or not the inclusion of element length be a consideration. This need not be specific solely to the AAMVA example, but may be an important consideration for all fields globally. This may also assist in ensuring there is uniformity in data.

C1 – Crash Date

The MMUCC describes months using their name as a designation. Most systems use numbers 01 through 12 for the month. AAMVA asks NHTSA whether consideration of the month through numerical designation may make more sense and/or assist in data uniformity and system conformance.

C13 – School Bus

AAMVA notes that “what constitutes a school bus” may be an important distinction. “School bus” is not a well-defined term, and there are even some discrepancies between federal regulations (“designed to transport x or more passengers including the driver” with x being a variable number). Providing guidance on what should be considered a school bus, for MMUCC purposes, would again assist in data clarity.

V2 – Vehicle Identification Numbers (VIN)

This section includes the following statement: “NHTSA encourages states to use vPIC”. AAMVA notes that vPIC is a tool used for VIN decoding, and that the collection of the VIN would most likely come from a VIN plate on the vehicle. AAMVA is unclear how vPIC may be used for VIN collection, and it would not make sense to collect the VIN from the plate to run it through vPIC. AAMVA recommends dropping this statement or providing additional clarification about how this would be used for the VIN.

V5 – Motor Carrier or Responsible Entity Identification

This section contains US DOT Number and MC/MX (ICC) Number. While you still occasionally see an ICC on vehicles, the USDOT Number is by far more prevalent, and the US DOT replaced the ICC in 1995. In practice, very few people are still collecting and relaying the ICC to records anymore. AAMVA defers to the Federal Motor Carrier Safety Administration (FMCSA) and the Commercial Vehicle Safety Alliance (CVSA) to provide insight into the utility of the ICC and whether this is still a necessary component to the MMUCC.

V7 – Motor Carrier Responsible Entity Name and Address

Motor Carriers may have a legal name and a “doing business” name and the names may differ. While it is understood that you should typically capture both if available, AAMVA again defers to FMCSA and CVSA in providing insight into which of these data fields are more important and whether clarity on which name should be recorded should be provided by NHTSA.

V8 – Motor Vehicle Registration State

The Attribute Values lists “ANSI State FIPS Codes”. These are numeric codes (e.g., New York code is “36”). The numeric value codes are not intuitive. State systems use the more intuitive USPS State codes (e.g., New York is “NY”). Data exchange systems like AAMVA and NLETS use the USPS codes as well – as do standards like D 20. AAMVA recommends NHTSA list USPS State Codes rather than the FIPS Codes. Roadside law enforcement would also more intuitively be able to refer to the USPS codes at roadside rather than look up the numeric FIPS codes for each event.

V10 – Motor Vehicle Make

The element definition for motor vehicle make is “the manufacturer-assigned, coded name applied to a group of motor vehicles.” The remarks then refer to vPIC. vPIC lists elements make_id and make_name. It is not clear if this element is meant to capture the ID or the clear name. AAMVA requests NHTSA provide additional clarity on which is intended.

Additionally, vPIC utilizes its own code values (for example, Honda is “474”). Law enforcement and DMVs tend to use NCIC codes for vehicle makes (e.g., Honda is “HOND”) this has been the convention used since the 1960s/1970s and are generally more intuitive than their numeric counterparts. Lists of vehicle makes are huge (tens of thousands of codes), so mapping from a vPIC to a NCIC codes is a large effort. Switching from NCIC to vPIC codes could be a huge disruption, and AAMVA recommends using the NCIC codes and not the vPIC codes and that NHTSA consider changing the references in the MMUCC. Separate from utilizing the NCIC codes for vehicle make in the MMUCC, NHTSA may also consider having the vPIC return NCIC codes.

The remarks state that "...data collected within the manufacturer reported data from 49 CFR Parts 551-574." Parts 551 to 574 of the CFR cover a lot of elements, and the same language is used broadly throughout the MMUCC (V2, V10, V11, V12, V18). Make is indirectly covered in part 566, and additional clarity may be provided by application of the CFR to specific elements where used.

V12 – Motor Vehicle Model

The MMUCC again references vPIC. As previously noted under V10 (but expanded as model is even more extensive than vehicle make) mapping from vPIC to NCIC code is a huge effort (likely the hundreds of thousands compared to the tens of thousands for make). This is an arduous and unnecessary process. AAMVA recommends that if model codes are used, that NHTSA recommend use of the NCIC code and not the vPIC code and make the MMUCC references reflect this applicably.

V13 – Motor Vehicle Body Type Category – Subfield 2

This section cites the "number of seats, including driver" and start at 9 (9-14; 15; 16+). [49 CFR 390.5](#) stipulates in the definition of commercial motor vehicle that it includes a vehicle that "is designed or used to transport more than 8 passengers (including the driver) for compensation; or is designed or used to transport more than 15 passengers, including the driver, and is not used to transport passengers for compensation." AAMVA asks for consideration about whether the reference "for" or "for no" regarding compensation is needed for purposes of the MMUCC. AAMVA requests clarity for purposes of the MMUCC on whether the count need start at 8 (or 9) and that consideration be given to conformance of the regulations with the content of the MMUCC. AAMVA defers to FMCSA on issues regarding enforcement.

V14 – Power Unit Gross Vehicle Weight Rating (GVWR)

AAMVA requests NHTSA confer with FMCSA on applicability of the categories under their regulatory purview as the applicable regulations may crossover between 383.91, 350.105, and 390.5.

The GVWR is the rating assigned to a vehicle by the manufacturer. This element is described as the GVWR of the power unit. The regulations use the GVWR when the vehicle is a single unit truck. However, when a truck has a trailer, then the regulations would be interested in the Gross Combination Weight Rating (GCWR). AAMVA requests NHTSA clarify with FMCSA how GCWR data is recorded.

V16 – Hazardous Materials Involvement

While AAMVA defers to FMCSA to provide input regarding this section, a driver under this category may be subject to harsher penalties, which may warrant a note regarding such in this section's rationale.

D3 – Driver License Jurisdiction

As mentioned earlier, the USPS codes are more intuitive and more commonly used than the FIPS codes. AAMVA recommends use of the USPS code rather than the FIPS code as an option.

Dx – Driver Crash, Commercial Vehicle Indicator

AAMVA believes that a determination of whether the crash occurred while the driver was operating a commercial motor vehicle is already being captured as a check box via many crash reports. AAMVA recommends FMCSA provide insight into the importance of this determination in terms of penalties and requests NHTSA work with FMCSA to consider the capture of this element as important to the MMUCC if it is not already being provided.

AAMVA again thanks NHTSA for its continued commitment to improving national safety and for its efforts in emphasizing the role traffic safety data plays in protecting the nation's roadways. AAMVA looks forward to continued collaboration on our shared safety mission and the next edition of the MMUCC.

Cian Cashin
AAMVA Director of Government Affairs
ccashin@aamva.org