

**INSURANCE INSTITUTE
FOR HIGHWAY SAFETY**

March 28, 2005

The Honorable Annette M. Sandberg
Administrator
Federal Motor Carrier Safety Administration
400 Seventh Street S.W.
Nassif Building, Room PL 401
Washington, D.C. 20590-0001

**Notice of Request for Clearance of a New Information Collection:
Bus Crash Causation Study; Docket No. FMCSA-2004-19185**

Dear Ms. Sandberg:

The Federal Motor Carrier Safety Administration (FMCSA) has requested comments on a proposed data collection effort to determine the causes and contributing factors of serious bus crashes. This effort is intended to help fulfill the bus portion of a required study on the causation of commercial motor vehicle crashes, mandated by the Motor Carrier Safety Improvement Act of 1999. After reviewing the proposal, the Insurance Institute for Highway Safety concludes that the proposed research is based on inadequate data and is too ill-defined. Thus little is likely to be learned from this expensive exercise.

FMCSA proposes three data collection efforts: (1) mining existing databases such as the Fatality Analysis Reporting System (FARS), Buses Involved in Fatal Accidents (BIFA), and Motor Carrier Management Information System (MCMIS); (2) evaluating insurers' bus crash causation data to assess the quality, quantity, and usefulness of other crash data; and (3) collecting extensive data on 50-100 commercial bus crashes that occur in New Jersey during 2005. Two of these data sources are deficient. FARS and BIFA contain only fatal bus crashes, and MCMIS does not provide a representative sample of commercial vehicle crashes due to numerous deficiencies in the completeness and accuracy of reported data. The data collected in New Jersey will have limited use because of the small sample and because the postcrash data gathered from drivers will be subject to substantial reporting biases.

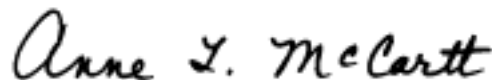
In addition to the inadequacies of the data, the proposed research lacks the detailed exposure data and comparison groups (e.g., noncrash-involved drivers) necessary to control for confounding effects from travel patterns and other variables while identifying crash risk factors. The research questions also are ill-defined. In particular, the study of New Jersey bus crashes appears to follow the previously criticized approach used in FMCSA's Large Truck Crash

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Causation Study (LTCCS). The LTCCS Review Committee, convened by the National Research Council, repeatedly noted in its Letter Reports that many important crash factors would not be addressed by LTCCS due to the lack of control groups or exposure data and limitations in the self-reported driver data, including poor response rates and response biases. In its final Letter Report, the Review Committee recommended that any future major safety studies should begin with precise statements of research objectives and hypotheses about crash causes or risk factors so that data collection methods and analyses could be designed to answer the questions of interest. The Review Committee also recommended that any future studies incorporate a methodology study as a distinct phase, a true pilot study, and an independent expert review from the earliest planning stages. There is no indication FMCSA has followed these recommendations in the proposed study of bus crashes.

The inadequacies of the proposed data sets and apparent study methods will be particularly acute when examining driver factors such as fatigued driving for which there will be no physical evidence at the crash scene. In short, there is little likelihood that the proposed data and methods will yield reliable information on important crash risk factors for large bus crashes. The Institute therefore urges FMCSA to reconsider its approach for this study.

Sincerely,



Anne T. McCartt, Ph.D.
Vice President, Research

cc: Docket Clerk, Docket No. FMCSA-2004-19185

Reference

Committee for Review of the Federal Motor Carrier Safety Administration's Truck Crash Causation Study. Letter Reports of: September 4, 2003; December 19, 2002; December 4, 2001; March 9, 2001; and November 15, 2000. Washington, DC: The National Academies. Available: <http://www4.trb.org/trb/onlinepubs.nsf/web/reports?OpenDocument>.