

# 21<sup>ST</sup> CENTURY NCAP RECOMMENDATIONS 2.0

The New Car Assessment Program (NCAP) – also known as the vehicle “5-star ratings” program – can be a valuable tool for informing consumers about the safety performance of vehicles, and can provide an effective, non-regulatory way to promote the adoption of new safety designs and technologies.

- Comparative safety ratings allow consumers to make informed choices when purchasing a new car and they incentivize manufacturers to achieve higher ratings and appeal to consumer demands for safety.
- Voluntary-based approaches can help provide a technology-neutral pathway for improving safety on our roadways.

## ***The Need for NCAP Reform to Advance Safety***

For consumer information programs to be successful, they must be responsive to safety innovation and keep pace with changes in the marketplace.

While recent updates to NCAP have shown progress, change is long overdue and there are still several programmatic and administrative aspects of the program that must be addressed if NHTSA is to avoid some of the challenges that have plagued the program in the past.

To modernize the program, accelerate the introduction of new safety technology, and ensure that the United States reestablishes itself as a leader in advancing safe vehicles on our roadways, the Alliance for Automotive Innovation (Auto Innovators) recommends three key pillars for reform:

### ***Maintaining a Roadmap for Success***

- Establish a consistent schedule for maintaining the NCAP roadmap.
- Develop frameworks to support more consistent expert stakeholder engagement.
- Ensure NCAP aligns with NHTSA regulatory and deregulatory priorities.
- Build on existing standards to help minimize unnecessary burden and ensure manufacturers can be more responsive to program changes.

### ***Enhancing Public Awareness***

- Build program recognition through public education and awareness campaigns.
- Improve consumer access to ratings information.
- Enhance educational resources that are available to consumers.
- Finalize the updated vehicle ratings structure.

### ***Improving Program Effectiveness***

- Restructure the program to be more responsive to changes in the marketplace.
- Permit manufacturer self-reporting to increase the number of vehicles rated each year.
- Establish a regular annual stakeholder meeting to identify program improvements.
- Create a Federal Advisory Committee to inform program updates.

## ***Reestablishing US Safety Leadership Through a Modernized NCAP***

The New Car Assessment Program (NCAP) – also known as the vehicle “5-star ratings” program – can be a valuable tool for informing consumers about the safety performance of vehicles. Although modern vehicles are as safe as they have ever been, the average age of vehicles in the United States now is now over 12 and a half years. Collectively, we must explore opportunities for increasing consumer awareness of new safety features in the hopes of encouraging a newer fleet of vehicles that can more significantly improve crash, injury, and fatality outcomes on our roadways.

In other parts of the world, programs similar to NCAP use vehicle ratings as an effective, non-regulatory way to promote the adoption of new safety designs and technologies. By providing comparative safety ratings information, consumers can make more informed choices when purchasing a new car. Manufacturers are also incentivized to achieve higher ratings to appeal to consumer demands for safety. Done well, this voluntary-based approach can provide a more technology-neutral pathway for improving safety on our roadways, and can reduce or even eliminate the need for more restrictive regulatory requirements.

The automotive industry makes significant investments in the research and development of new and innovative safety features. Some of these include:

- Crash avoidance technologies designed to help prevent or reduce the severity of crashes
- Improved restraint systems and structural design changes to better protect occupants in the event a crash occurs, and
- In-cabin support features to help assist the driver with the driving task.

For consumer information programs to be successful, they must be responsive to the industry’s innovation, keep pace with changes in the marketplace, and adapt to new vehicle technologies as they become more ubiquitous in the fleet. Efforts by the National Highway Traffic Safety Administration (NHTSA) to reinvent the program along these lines have historically been unsuccessful. However, recently, we have seen progress in charting a path forward for NCAP and providing a clear roadmap. In 2024, new test procedures were added to assess the performance of certain crash avoidance technologies, including automatic emergency braking and forward collision warnings, blind spot warnings and intervention, and lane departure warning and lane keep assist systems. The program was also updated to evaluate pedestrian crash protection in addition to the existing frontal, side, and rollover crash safety ratings. It is important to note, however, that the ratings system does not provide a star rating for easy one-to-one comparison of vehicles.

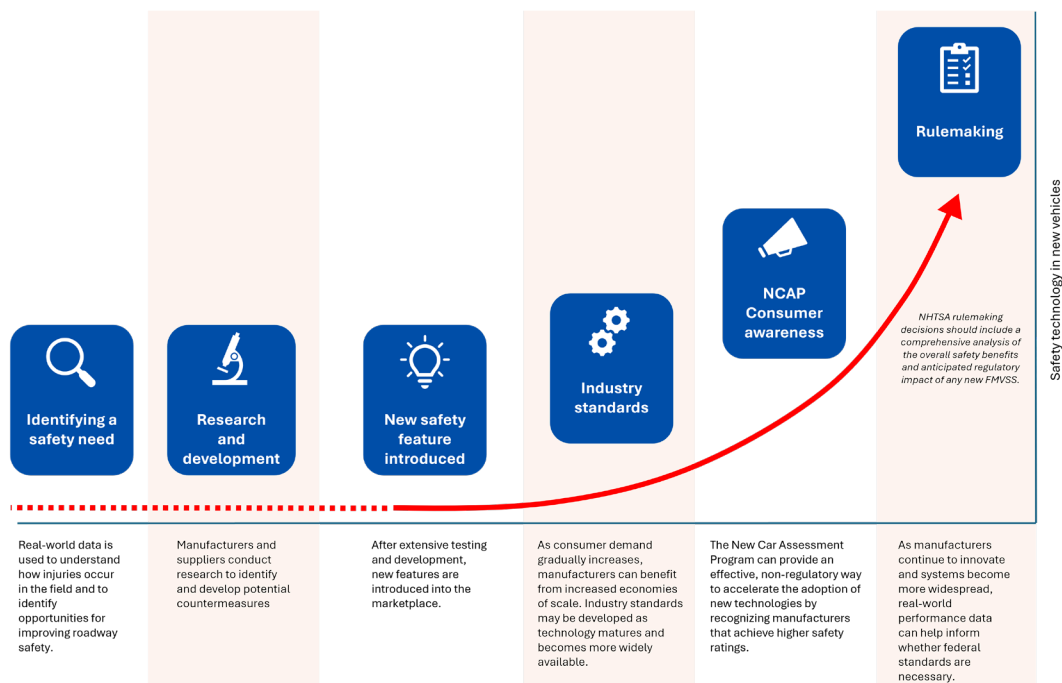
While these recent developments are encouraging, there are still several aspects of the program that must be addressed if NCAP is to avoid some of the challenges that have plagued the program in the past. To modernize the program, accelerate the introduction of new safety technology, and ensure that the United States reestablishes itself as a leader in advancing safe vehicles on our roadways, the Alliance for Automotive Innovation (Auto Innovators) recommends three key pillars for reform. These three pillars are: (1) maintaining a roadmap for success, (2) enhancing public awareness, and (3) improving program effectiveness.

### ***PILLAR 1: Maintaining a Roadmap for Success***

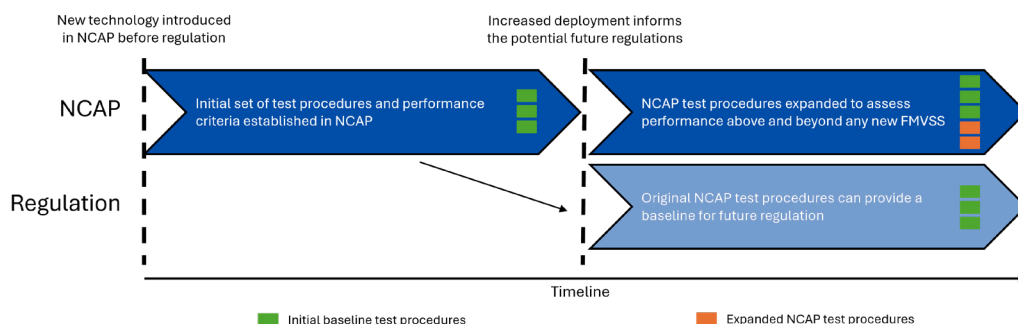
For NCAP to effectively guide and accelerate industry investment, the program must be updated on a consistent and predictable basis. An NCAP roadmap provides alignment within the agency on research, planning and decision making, and also helps inform auto industry investments in the development of new safety technologies. The roadmap cannot remain a static document. It must adapt to the rapid pace of innovation and changes in the marketplace.

- **Establish a consistent schedule for maintaining the NCAP roadmap.** To ensure the roadmap remains relevant and reflects the agency’s mid-to-long term objectives, NHTSA should review the roadmap every three years and publish an updated timeline to reflect any changes to the agency’s research objectives or key decisions. Updates to the roadmap should also reflect the current state of technology and ensure a data-driven approach to determine which aspects of vehicle performance will be evaluated (or removed) as part of the ratings program.

- **Develop frameworks to support expert stakeholder engagement.** The agency also must ensure that the roadmap development process is data driven and focused on advancing proven technologies that have demonstrated initial safety benefits based on real-world safety performance. To do this, in addition to soliciting written public comments, the agency should ensure proactive engagement with expert stakeholders to understand the benefits, limitations, and maturity of new technologies under consideration. This will require a new approach. For example, NHTSA could facilitate a dynamic, streamlined, and transparent process through documented, expert stakeholder workshops to inform future program updates and proposed test procedures. In addition, subject matter experts could help support the agency in exploring opportunities to leverage simulation as an alternative to physical testing.
- **Ensure NCAP aligns with the NHTSA regulatory and deregulatory priorities.** Although the program is voluntary, NCAP's influence on vehicle design decisions can be significant. If there are inconsistencies or misalignment between Federal Motor Vehicle Safety Standards and NCAP, manufacturers will face conflicting requirements as they design and develop vehicles. As a result, NHTSA must ensure that NCAP test procedures complement any existing or planned regulatory requirements, and that the NCAP roadmap and related research priorities align with the agency's broader rulemaking agenda.



- **Build on existing standards.** Although it is important for the NCAP program to raise the bar on safety, updates to the ratings must account for the current state of technology, the lead time required to implement vehicle design changes, and complex global regulatory requirements. If the ratings do not leverage established industry standards or international requirements, manufacturers may not be able to respond quickly to program changes, and consumer perceptions of the overall value and performance of proven safety technologies may be negatively impacted. NHTSA can accelerate the rollout of proven technology by enabling vehicle manufacturers to build upon existing research and development efforts, and rewarding proactive industry efforts, as opposed to requiring U.S. specific designs that may impose unnecessary costs on manufacturers and consumers.



## **PILLAR 2: Enhancing Public Awareness**

The benefits of NCAP can only be fully realized if consumers are aware of the program and see value in the ratings information. NHTSA should consider a “back to basics” approach that focuses resources on external engagement and consumer education. This will help increase program awareness and underscore the benefits of new and emerging safety technologies.

- **Build program recognition.** The way consumers access information is constantly evolving. It is important that NHTSA leverage all reasonably available tools and contemporary means for engaging the public to enhance program awareness. In addition to updating the agency’s website to include new ratings information, the agency should also consider the development of regular press releases, public education campaigns, and social media content to help strengthen public recognition of the program. These efforts should be guided by ongoing consumer research to identify approaches that resonate most with different consumer groups.
- **Improve access to information.** Although NHTSA makes vehicle ratings information available on its website and mobile app, there are a number of changes that should be considered to improve access and ease of use when navigating these resources. These include improved search functionality and redesigning how comparative vehicle ratings information is presented to consumers. As a starting point, the agency should benchmark its current online resources against similar consumer ratings programs, and review its tools on a periodic basis.
- **Enhance educational resources.** In addition to providing ratings information, NCAP can be a valuable tool for communicating the benefits of emerging safety technology to consumers. NCAP can also be a resource where consumers learn more about emerging technologies, including the potential benefits of technologies not currently rated as part of the program. These additional resources can provide additional value for consumers during the vehicle purchasing process, and help further the agency’s goal of advancing safety.
- **Finalize the updated vehicle ratings structure.** The agency should ensure that any updates to the vehicle ratings are clearly communicated to the public and implemented in a timely manner as new technologies are added. To facilitate the ability of consumers to compare the ratings of vehicles, NHTSA should prioritize updates to the star rating and Monroney label that is affixed to all new cars. Based on our research, consumers have a good understanding of the star rating structure and it provides the ability to easily compare vehicles. Most consumers also view an overall vehicle rating as being important. Given that changes to the Monroney label are complex, NHTSA should focus on limiting any changes to the label to a single, one-time update. Other, more detailed NCAP ratings information, including newly rated crash avoidance technologies, should be made available through the agency’s website. Supporting materials should also be developed to help consumers understand that changes in ratings from year to year may be due to updates in the rating system and it becoming more stringent or weighing technologies differently.

***NCAP can be a valuable tool for communicating the benefits of emerging safety technology to consumers:***



***Regular Press Releases***



***Public Education Campaigns***



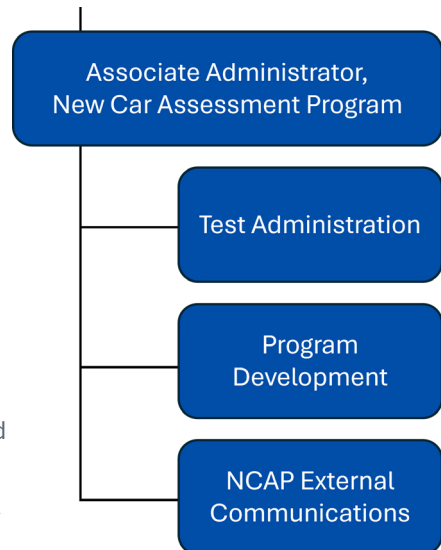
***Social Media Content***

### PILLAR 3: Improving Program Effectiveness

To fully modernize NCAP and support continued improvements moving forward, several substantial administrative changes are needed.

- **Restructure the program within NHTSA.** Operating the NCAP program through the agency's office of rulemaking makes needed flexibility and responsiveness to changes in the marketplace challenging and may stifle NCAP's long-term success. NHTSA should consider a reorganization that provides the program with more operational independence and greater staff specialization, while also ensuring appropriate frameworks are in place to maintain coordinated alignment with other parts of the agency. More specifically, NHTSA should consider restructuring and assigning dedicated staff focused on the following:

- » **Test Administration** – This dedicated staff would be focused on day-to-day program administration, working directly with OEMs and NHTSA test labs to conduct testing and collect information needed to support the development of ratings information.
- » **Program Development** – This staff would provide strategic direction to the program by working closely with NHTSA research and rulemaking staff as well as external stakeholders to support the ongoing maintenance and implementation of the NCAP roadmap.
- » **NCAP External Communications** – This staff would be dedicated to enhancing program awareness through increased public engagement and working in close collaboration with the NHTSA communications department.



- **Permit manufacturer self-reporting.** The success of the program relies on the ability to provide meaningful safety information to consumers. However, as NCAP continues to expand, the required number of vehicle tests needed to develop a complete vehicle rating will increase significantly, reducing the number of vehicles that can be rated each year due to increased time and resource constraints on agency sponsored testing. NHTSA should consider expanding the current self-reporting framework for pedestrian protection across all aspects of the program while maintaining discretion for conducting audits on a periodic basis. This could increase the number of vehicles rated each year by enabling greater voluntary participation, while also enabling testing resources to be more effectively reallocated to increase public awareness.
- **Establish a regular annual stakeholder meeting to identify program improvements.** There are several areas where the current administrative processes could be improved to increase program efficiency and reduce the overall burden. For example, further simplifying the annual NCAP information collection request could help give precedence to priority safety information most relevant to consumers. Similarly, developing a more transparent process for addressing unforeseen delays in vehicle testing (or the processing of test results) will help ensure that ratings information can be published in a timely manner. NHTSA should develop internal metrics to help support program review and evaluation and reestablish an annual stakeholder meeting to help identify opportunities for resolving any issues that have been identified during the previous year.
- **Create a Federal Advisory Committee to inform program updates.** In addition to ongoing stakeholder engagement, the agency should consider establishing a Federal Advisory Committee to support the development of recommendations for NHTSA to consider when making future changes to the program, including updates to the agency's roadmap. The committee should include a balanced representation of vehicle manufacturers, suppliers, safety advocates, and academics, with clearly defined roles and responsibilities for participating members.