

**Statement
of the
National Association of Mutual Insurance Companies
to the
United States House
Committee on Energy and Commerce
Subcommittee on Commerce, Manufacturing, and Trade**

**“Examining Legislative Options to Strengthen Motor
Vehicle Safety, Ensure Consumer Choice and Affordability,
and Cement U.S. Automotive Leadership”**

January 13, 2026



The National Association of Mutual Insurance Companies (NAMIC) is pleased to provide comments regarding the U.S. House Energy and Commerce Subcommittee on Commerce, Trade, and Manufacturing hearing: *“Examining Legislative Options to Strengthen Motor Vehicle Safety, Ensure Consumer Choice and Affordability, And Cement U.S. Automotive Leadership.”*

The National Association of Mutual Insurance Companies (NAMIC) is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies—including local and regional insurers as well as some of the nation’s largest carriers—NAMIC members collectively write \$467 billion in annual premiums, representing 61% of the homeowners and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.¹ We applaud the Committee for holding today’s hearing as a first step for several promising proposals and encourage a continued commitment to legislation and policies that improve vehicle affordability and consumer options for all Americans without sacrificing safety.

The Current State of Cars and Roads Facing Policyholders and Insurers

More than 75% of American commuters use their car to move between home and work every day, and the average American will spend more than 50 minutes per day behind the wheel this year. At the same time, buying a car is the second biggest purchase behind a home that most Americans will make in their lifetime, and the cost of that purchase continues to climb. Heading into the 2026 model year, the average transaction price on new vehicles has eclipsed \$50,000², many auto loan terms are stretching to nearly 10 years³, we face an annual shortfall of 37,000 trained auto technicians⁴, and collision repair costs – most often borne by insurers – continue to significantly outpace inflation.⁵

The property/casualty insurance industry in the U.S. proudly provides financial security for more than 250 million personal and commercial vehicles of all makes, models, and cost on U.S. roads each year. In 2026, our nation’s roads are expected to see more vehicle miles traveled than ever⁶; drivers and pedestrians will sadly face more than 7 million crashes resulting in approximately 40,000 deaths and 2.5 million injuries. During those trying moments, our members are there to help policyholders. Despite the encouraging downward trends reported in NHTSA’s latest fatality reports⁷, the economic and societal costs of crashes continue to climb, exceeding \$340 billion per year.⁸

¹ <https://www.namic.org/about-namic/>

² <https://www.coxautoinc.com/insights-hub/sept-2025-atp-report/>

³ <https://www.wsj.com/business/autos/car-payments-now-average-more-than-750-a-month-enter-the-100-month-car-loan-fcd7d284>

⁴ <https://www.nada.org/nada/issues/service-technicians>

⁵ <https://www.autobpa.com/2025/10/27/new-cpi-data-shows-collision-repair-inflation-significantly-outpacing-consumer-prices/>

⁶ https://www.fhwa.dot.gov/policyinformation/travel_monitoring/25septvt/figure1.cfm

⁷ <https://www.nhtsa.gov/press-releases/nhtsa-reports-sharp-drop-traffic-fatalities-first-half-2025>

⁸ <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813403.pdf>



As the Committee considers sixteen proposals today around safety, affordability, vulnerable road users, and automated vehicle features, we encourage you to prioritize the principles of affordability, risk reduction, and safety in the design and use of vehicles and roads. The reduction of deaths, injuries, and property damage for policyholders through rigorous scientific research, public education, and attendant legislation and regulation is mission critical for NAMIC members. In addition to our outreach to federal and state legislators, we are actively engaged on multiple initiatives to reduce risky driving behavior to better protect policyholders with our counterparts at the Insurance Institute for Highway Safety (IIHS), Advocates for Highway and Auto Safety, the National Alliance to Stop Impaired Driving (NASID), the Governors Highway Safety Association (GHSA), the Association of American Motor Vehicle Administrators (AAMVA), National Highway Traffic Safety Administration (NHTSA), and the US Department of Transportation as a first mover supporting implementation of a National Road Safety Strategy.

Reducing risks on roads in the future also includes responsibly unlocking the potential safety enhancements represented by more automated vehicles, another area of prominent NAMIC engagement with organizations like the National Judicial College and the Partnership for Automated Vehicle Education. NAMIC fully supports innovation and the development of ADS that enhances safety. Rigorous regulatory oversight and proper validation of safety cases over time while removing those regulatory burdens that simply make no sense for new technologies will help instill public confidence in AVs, enabling faster, better, and more affordable transit options that improve the lives of many citizens who currently struggle with mobility. These advances should not, however, be green-lit or rushed without proven validation of safety.

Keeping Validated Safety Paramount Without Unnecessary Burdens

Since its first Federal Motor Vehicle Safety Standard (FMVSS) was issued in 1967, NHTSA's scope, resources, and the aggressiveness through which it has pursued its statutory mandates have fluctuated significantly. The agency has undoubtedly had a net positive effect on driver safety – airbag requirements alone are estimated to have saved more than 70,000 lives; collectively the agency estimates that its safety standards have prevented more than 860,000 deaths, 49 million nonfatal injuries, and damage to 35 million vehicles.⁹ NHTSA is also responsible for compiling and publishing numerous important reports, surveys, and assessment programs whose use extends well beyond the automotive and insurance industries.

NAMIC believes there is a proper role for the federal government to play in establishing and enforcing minimum vehicle safety standards, as well as developing and funding safety research and public education – the incredibly effective “Click It or Ticket” program that coincided with the nation-wide seat belt usage rate going from 67% to 84% would not have been possible without NHTSA's support and coordination. However, in recent years, NHTSA has been unable to keep up with its required rulemakings and its focus under prior Administrations shifted to crusades around environmental requirements and advocacy for electrification. A more properly directed NHTSA faithfully adhering to its congressional mandates can help all stakeholders in the effort to address auto affordability. To fulfill its statutory mandate, NHTSA should implement practical safety rules that make sense for today and into the future that do not impose excessive financial burdens on any of the parties involved in vehicle purchase or repair transactions.

⁹ <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813647>

While NHTSA's FMVSS requirements appropriately continue to apply across vehicle manufacturers, it is important to point out that they are performance requirements, not design or development requirements. Auto manufacturers have the freedom to choose *how* they meet crash avoidance, crashworthiness, speed, or braking and electronic stability control safety performance requirements. When manufacturers argue that standards are outdated, overly prescriptive, or misaligned with modern vehicle design, that should serve as a catalyst for improvement and updates, not wholesale elimination or challenges for the sole purpose of delays. Additionally, while the federal government is the appropriate authority to make determinations of vehicle performance, safety, and data integrity, it is essential that state and local authorities retain the authority to define and address all matters concerning the regulation of insurance for vehicles and operators, as well as registration, licensing, and operation.

Congress Can Help Alleviate Risks and Promote Affordability

There is no single policy prescription or magic spell to make vehicles safer and more affordable. Much of the work needed in this arena remains most appropriately handled by state and local officials, but there are things Congress and federal agencies can do to substantially improve both auto affordability and road safety by reducing risks, many of which are on today's agenda¹⁰:

REPAIR Act

NAMIC supports the REPAIR Act (H.R. 1566) *as introduced*. The proposal would eliminate unfair repair restrictions and promote solutions that enhance consumer choice in repair facilities and parts in the marketplace, thereby also reducing costs. Crash repair costs are unfortunately becoming unsustainable for insurers and their policyholder vehicle owners across the country. The \$60 billion auto repair industry represents the largest single market for the repair of consumer goods in the U.S.¹¹ While consumers and insurers struggle more and more with increased cost in that market, parts manufacturers and select dealership connected body shops remain the only ones who benefit from artificial repair restrictions that maximize the prices of parts and labor.¹²

NAMIC believes firmly that purchasing a vehicle, especially a newer model, should not mean surrendering consumer choice and abandoning competition in the marketplace to service and repair that vehicle. Questions of post-sale restrictions on individual property have long been debated; in the automotive context that encompasses where, by whom, and with what parts a vehicle can be fixed. When the REPAIR act was originally introduced in February of 2022, data was cited by the sponsor indicating that 70% of the 288 million registered vehicles in the U.S. are maintained by independent repair facilities – a number that is both a result of and an overwhelming endorsement of consumer choice.¹³

¹⁰ While this testimony expresses explicit support for some bills, it should not be taken to mean that NAMIC does or does not support other proposed measures; given the abbreviated time frame for review following the hearing announcement, several proposals are still being considered for potential support.

¹¹ Parmakoski, Aaron. "*White Paper on the Right to Equitable and Professional Auto Industry Repair (REPAIR) Act, H.R. 6570, 117th Congress.*" (September 2022)

¹² *Id.*

¹³ Congressman Bobby Rush press release, Feb 3, 2022.



Our day-to-day lives are often extremely influenced by our vehicles' ability to operate; rising costs, long lines at unfamiliar locations, and confusion about the meaning of data generated by one's own vehicle does not have to be the new reality. Transparency, communication, and market competition to foster choice all serve to benefit drivers, and passing the REPAIR Act is a way lawmakers can reduce costs and mitigate some of the inconveniences associated with vehicle maintenance and repair for their constituents.

PART Act

NAMIC supports the PART Act (H.R. 5221). Catalytic converter theft is a national problem worthy of federal legislation that builds on the extensive efforts many states are undertaking in this space. Unfortunately, there is a lucrative black market for these easily removable parts that hold high value because of the valuable metals within. Converters are also expensive to replace right now due to supply shortages and increased demand, partially stemming from the theft epidemic.

The PART Act would provide a national framework to help law enforcement combat converter theft, establishing requirements for traceable identifying number stamping on the parts, recording of transactions, and making the theft, sale, trafficking, or known purchase of stolen converters a federal crime punishable by up to five (5) years in jail. Passing this bill will help address the ongoing problem of catalytic converter theft.

DRIVER Act

NAMIC supports the DRIVER Act (H.R. 6687). Vehicles on the road today are increasingly reliant on computers, connected to the internet, and equipped with technologically sophisticated advanced safety equipment. Safe operation and maintenance of these vehicles requires access to and understanding of relevant data generated by the vehicle. The owner/lessee of an auto has the legal obligation to operate and maintain the vehicle in a safe manner, for their own safety and the safety of other occupants and road users. Accordingly, we agree that it is appropriate to affirm full data ownership to vehicle owners, who should have secure, real-time access to all data their vehicle produces – through standard physical ports and wireless interfaces – without paying additional fees to manufacturers. The bill supports strong privacy protections, protects national security, and is consistent with NAMIC's Auto data principles.

Driver Technology and Pedestrian Safety Act

NAMIC supports the Driver Technology and Pedestrian Safety Act (H.R. 3360). We believe it is appropriate for the federal government to study the effects of driver-controlled technology with respect to severe traffic injuries, fatalities, driver distraction, and property damage that result from replacing tactile motor vehicle controls with touch-based systems. We believe such a study would yield actionable recommendations to reduce risk on U.S. roads, as well as improving NHTSA's data collection and reporting mechanisms to reflect realities of how modern drivers' hands interact with their vehicle controls.

Automated and Autonomous Vehicle Legislation – AV Data Safety Act, SELF DRIVE and related Bills

The potential for autonomous technology to move the needle on crash statistics is extraordinary; however there will still be crashes, especially in an environment where AVs share the road with human drivers. Chances are good that a crash between an AV and a human driver will involve a NAMIC member company's



policyholder. It is important to note that ADS, in and of themselves do not fundamentally change the legal theories of liability associated with motor vehicle crashes. As ADS crashes happen and questions of liability arise, insurance will play a crucial role for ADS manufacturers, suppliers, owners, operators, and passengers.

NAMIC supports the AV Safety Data Act (HR 4376). This bill is designed to provide basic transparency about how many miles driverless cars are traveling and when there are other types of incidents like unplanned stoppages or the blocking of emergency vehicles. In addition to codifying NHTSA's existing collision data reporting requirements in law, the AV Safety Data Act would also require that companies report to NHTSA the total number of miles traveled on public roads, AV collisions that result in any injuries to other human drivers, pedestrians, or bicyclists, and information on unplanned stoppages and impacts to law enforcement, first responders, or public transit agencies. NAMIC's AV principles call for a robust public information and data framework around the expected performance and safety of various levels of ADS.

Where the SELF DRIVE Act is concerned, NAMIC is hopeful we can work with the bill sponsors to ensure it is amended to avoid conflict with NAMIC's AV principles. While the bill makes no direct references to insurance, we are very concerned with the vague and broad nature of the proposed preemption in Section 3(d), which appears to prohibit "any law rule, regulation, requirement, standard, or other provision" that limits the introduction of ADS as long as the manufacturer develops a safety case described elsewhere in the bill. This could infringe on authority around registration, licensing, operation, and even insurance requirements that we believe are most appropriately left with the states. Upon initial review, the requirements for establishing a "safety case" appear less demanding than even NHTSA's current voluntary safety self-certifications. We also share concerns expressed by other stakeholders around testing procedures and the potential for uncertainty in legal standards of care applicable to AV's, which are most appropriately defined in state tort law and regulation. Failure to clarify these issues would represent a missed opportunity and could lead to unnecessary confusion in this rapidly developing market.

Conclusion

Insurers have long championed auto and road safety issues; it was nearly four decades ago that a coalition of insurance companies joined consumer groups to support state requirements for seat belts, used by less than 15% of drivers at the time. Today, we fully endorse and stand behind the efforts of groups like IIHS to engage in concrete research, testing, and education to identify and address risks inside and outside vehicles. It should not be lost on the committee that new vehicles on the road today are safer than they have ever been.¹⁴ This is cause for celebration and keeping those safety requirements that work while making sure we are not regulating away the capacity for innovation and development of promising new technologies with potential to make vehicles and roads safer for all users.

Improving access to safer vehicles on safer roads at lower costs benefits all Americans. As NAMIC members continue to play their role of identifying, assessing, and pricing risks to drivers, we offer our support and expertise to the committee on all of the measures under consideration today as it moves forward with its work.

¹⁴ https://www.nhtsa.gov/sites/nhtsa.gov/files/documents/newer-cars-safer-cars_fact-sheet_010320-tag.pdf