

**Statement
of the
National Association of Mutual Insurance Companies
to the
United States Senate
Committee on Commerce, Science, and Transportation**

“Hit the Road, Mac: The Future of Self-Driving Cars”

February 4, 2026

Introduction

The National Association of Mutual Insurance Companies (NAMIC) is pleased to provide our comments regarding the U.S. Senate Commerce, Science, and Transportation Committee hearing: *"Hit the Road, Mac: The Future of Self-Driving Cars."*

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 on the timely topic of autonomous vehicles (AVs), and we encourage a continued commitment to legislation and policies that promote American innovation to improve transportation options for all consumers while maintaining a steadfast commitment to safety. NAMIC believes that safety and innovation are complementary rather than conflicting concepts – when properly applied, both can reduce the risk, frequency, and severity of crashes while improving the accessibility and affordability of mobility for all road users. However, innovation that fails to prioritize safety can have the opposite effect – increasing injuries and loss of life.

The Current State of Cars and Roads Facing Policyholders and Insurers

More than 75% of Americans 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 price points on U.S. roads each year. As we begin 2026, our nation's roads are expected to see more vehicle miles traveled (VMT) than ever before.⁶

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

Drivers and pedestrians will likely face more than 7 million crashes resulting in approximately 40,000 deaths and 2.5 million injuries this year. During such trying times, NAMIC members step in to help. Even with 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

Against this backdrop, it is no surprise that evolving vehicle technology and AVs are sparking more interest than ever before. We share the Committee's excitement for the potential safety, affordability, and mobility access improvements that the proliferation of AVs can represent. As the Committee takes up this important issue today and moving forward, we encourage you to prioritize risk reduction and safety in tandem with innovation and U.S. leadership. The reduction of deaths, injuries, and property damage for policyholders through rigorous scientific research, improved safety technology, public education, and attendant legislation and regulation is mission critical for NAMIC members – we are cautiously optimistic AVs will be a growing part of these efforts. The potential for AV technology to reduce both crash frequency and severity is extraordinary; however, there will still be crashes, especially in the immediate future where AVs share the road with human drivers. A crash between any combination of AVs and humans will likely involve multiple insurance policies, raising complicated, difficult, and fact specific liability questions.

Safety is not just a buzzword for us; at NAMIC 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 in support of the National Road Safety Strategy. We will continue to show up for every conversation on developing policies and systems that make U.S. roads safer and easier to access for all users.

AV Safety is The Critical Issue for Insurers

There is no question that reducing risks on roads in the future includes responsibly unlocking the potential safety enhancements represented by AV expansion. NAMIC has already engaged extensively on the topic with member companies, insurance regulators, state policymakers, and organizations like the National Judicial College⁹, the Partnership for Automated Vehicle Education¹⁰, and the Collision Industry Electronic Commerce Association¹¹, among others. Considerations and analysis of the potential impacts of AVs are not new for the insurance industry – in 2019 NAMIC adopted seven principles¹² on the topic to guide our advocacy in Washington, D.C., and across state legislatures – since then we have presented at dozens of

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>

⁹ <https://www.judges.org/courses/steering-into-the-future-autonomous-vehicles-and-ai/>

¹⁰ <https://pavecast.buzzsprout.com/1904760/episodes/14510506-pavecast-u-s-and-u-k-perspectives-on-avs-and-insurance>

¹¹ <https://www.cieca.com/blogs/post/presenters-announced-for-cieca-connex-2025-annual-conference>

¹² See Appendix-A.

conferences to provide an insurance perspective and published numerous public policy white papers in the arena:

- [*Validating Safety: The Next Phase in Developing Automated Driving Systems*](#)
- [*Responsibility Assessment Standards for Conditional Automation/Dual Control Vehicles*](#)
- [*Liability Standards for Automated Vehicle Shared Driving Crashes*](#)
- [*Autonomous Vehicle Technology and the Insurance Impact*](#)

As our principles indicate, NAMIC fully supports innovation and the development of automated driving systems, or ADS, that enhances safety. Rigorous regulatory oversight and proper validation of safety cases and data over time and removing those regulatory burdens that simply make no sense for new technologies will help instill public and insurer confidence in AVs, enabling faster, better, and more affordable transit options that improve the lives of many citizens who currently struggle with mobility. Additionally, AV involvement in commercial freight carries tremendous potential to reduce shipping costs and fuel consumption while reducing supply chain risk. These advances should not, however, be green-lit or rushed without proven validation of safety through a trustworthy process transparent to all federal, state, and industry stakeholders.

Validating Safety 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.¹³ 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, as well as monitoring and enforcing the third amended Standing General Order governing incident reporting for AVs.¹⁴

NAMIC believes there remains 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 about evolving vehicle technologies. However, in recent years, NHTSA has failed to keep up with its required rulemakings and its focus has at times drifted into policy initiatives beyond its primary statutory mission such as imposing environmental requirements and advocacy for electrification of the vehicle fleet. A properly directed NHTSA, faithfully sticking to its Congressional mandates, can help all stakeholders in the efforts to address auto affordability and AV proliferation. Acting in that spirit, the U.S. Department of Transportation and its sub-agencies like NHTSA and FMCSA should tailor rules for AVs that make sense for today and into the future without imposing excessive financial burdens on any of the parties involved in vehicle design, purchase, or repair transactions.

¹³ <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813647>

¹⁴ https://www.nhtsa.gov/sites/nhtsa.gov/files/2025-04/third-amended-SGO-2021-01_2025.pdf

Auto and AV manufacturers should continue to enjoy the freedom to choose *how* they achieve federal safety performance requirements, be they about crash avoidance, crashworthiness, speed, or braking and electronic stability control. If officials find that standards are outdated, overly prescriptive, or misaligned with modern vehicle design, that should serve as a catalyst for common-sense improvement and updates, not necessarily wholesale elimination. The same is true for in areas such as driver “hours of service” requirements where commercial trucks are concerned. Additionally, while the Federal government is the appropriate authority to make determinations of vehicle design, safety performance, 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 road operation rules for AVs in their states and communities, whose insurance and traffic codes are built on the understanding that the person behind the wheel performs dynamic driving tasks. Perhaps most importantly, states should retain the authority to define and address AV liability issues in state tort law and regulations. The reality is that states and localities know best what works for their roads, driving populations, and state courts.

Congressional AV Legislation - “Show Your Work”

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 have long supported a robust public information and data framework around the expected performance and safety of various levels of ADS.

Where the SELF-DRIVE Act Discussion Draft¹⁵ introduced at the January 13, 2026 House Energy and Commerce Subcommittee on Commerce, Manufacturing, and Trade hearing is concerned, NAMIC is hopeful we can work with the bill sponsors to incorporate important clarifications to the legislative draft. We are 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 regarding the registration, licensing, operation, and even insurance requirements that we believe are most appropriately left with the states. The bill sponsor, Rep. Latta, indicated during the hearing that the preemption provision is not intended to upset current state and local laws related to issues that are well within state and local purview, such as traffic, franchising, titling, and licensing.¹⁶ We believe that the pre-emption provision of any AV legislation should be as narrowly tailored as possible to limit potential conflicts. We also share concerns expressed by other stakeholders regarding testing procedures and the potential for uncertainty in legal standards of care applicable to AV’s, which are most appropriately defined

¹⁵ https://d1dth6e84htgma.cloudfront.net/03_H_R_SELF_DRIVE_Act_c6810113bc.pdf

¹⁶ <https://energycommerce.house.gov/events/cmt-subcommittee-examining-legislative-options-to-strengthen-motor-vehicle-safety-ensure-consumer-choice-and-affordability-and-cement-u-s-automotive-leadership>

in state tort law and regulation. Failure to provide clear standards would represent a missed opportunity and could lead to unnecessary confusion in this rapidly developing market.

While AV's Develop, the Senate Can Help Alleviate Risks and Promote Affordability for Other Autos

There is no single policy prescription or magic spell to make all vehicles safer and more affordable. As with AVs, much of the work needed in the non-AV space remains most appropriately handled by state and local officials, but there are things Congress can do to substantially improve both auto affordability and road safety by reducing risks in the immediate future:

REPAIR Act

NAMIC supports Sens. Hawley and Lujan's REPAIR Act (S. 1379). 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.¹⁷ While consumers and insurers struggle more and more with increased costs, 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.¹⁸

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. For hundreds of years, public policy has taken issue with post-sale restrictions on individual property; 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.¹⁹

Our day-to-day lives often rely on 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 the Senate can reduce costs and mitigate some of the inconveniences associated with vehicle maintenance and repair for their constituents.

PART Act

NAMIC supports Sens. Moreno and Klobuchar's PART Act (S. 2238). 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

¹⁷ Parmakoski, Aaron. "White Paper on the Right to Equitable and Professional Auto Industry Repair (REPAIR) Act, H.R. 6570, 117th Congress." (September 2022)

¹⁸ Id.

¹⁹ Congressman Bobby Rush press release, Feb 3, 2022.

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.

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. Since that time, insurers have been at the forefront promoting auto safety laws, regulations and practices. Today, we fully endorse, financially invest in, 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, both human driven and autonomous.

Vehicles on the road today are safer than ever before, and that progress deserves recognition. At the same time, policymakers must ensure that effective safety standards remain in place while avoiding regulations that unintentionally stifle innovation. AVs must be included in future safety analyses, even as legitimate questions remain about the completeness and reliability of industry-reported data. Where AVs can reduce risk, insurers will continue to support their responsible development.

Improving access to safer vehicles on safer roads at lower costs benefits all Americans. As NAMIC members continue to identify, assess, and price risk, we stand ready to support the Committee with expertise on AVs and their effects on states, cities, insurers, and, most importantly, policyholders.



NAMIC Board Approved AV Principles

At its March 26, 2019 meeting, the NAMIC Board of Directors approved the revised statement of principles:

1. NAMIC fully supports Automated Driving System (ADS) innovation and development that enhances safety. As the development of automated vehicles goes forward, the insurance industry will continue to play a leadership role as it has done historically to promote safety and the protection of persons and property.
2. Insurers should have access to a robust ADS information and data framework – including crash accident and incident information and data for businesses purposes including underwriting and rating – that is timely, complete and useful.
3. The Federal government – through NHTSA – should have the authority to make determinations of performance and safety, as well as data integrity, of ADS, and should build a framework for helping the public clearly understand expected performance and safety of various levels of ADS.
4. States and localities should have the authority to make the determinations of the registration, licensing, and operation of ADS in that state/locality.
5. States should retain the regulation of insurance for the vehicle and/or operator.
6. States should retain the authority to define and address ADS liability issues in state/tort law and regulation in line with existing liability constructs.
7. States and federal authorities working together should make clear and workable data security and privacy requirements for ADS.