



RE: NHTSA-2020-0024-0001: Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Survey of Drowsy Driving Knowledge, Attitudes and Behaviors

The American Alliance for Healthy Sleep (AAHS) appreciates that opportunity to submit comments in response to the National Highway Traffic Safety Administration (NHTSA) National Survey of Drowsy Driving Knowledge, Attitudes and Behaviors. As an organization dedicated to improving the lives of patients with sleep disorders and spreading awareness for the importance of healthy sleep practices, the AAHS supports and commends the NHTSA's efforts to gather data on drowsy driving, which will inform drowsy driving prevention strategies in the future.

According to the request for comments, NHTSA plans to contact participants via mail; to improve efficiency and cost-effectiveness of the survey, the AAHS suggests that participants be contacted, and the survey completed, by electronic means instead, if possible. This will lessen the administrative burden and lower costs for the survey.

The AAHS would also suggest that NHTSA allow the survey to be completed anonymously, with demographic identifies but no personal information. The survey may suffer from reporting bias if not anonymous as participants may underreport or may not be willing to disclose certain behaviors (such as having fallen asleep while driving) otherwise. Also, NHTSA should recognize that the data may be skewed due to the subjective nature of the survey, as those who drowsy drive may do so out of necessity and may underestimate the frequency of this behavior.

Stakeholders, including the AAHS, should be involved in reviewing and providing feedback on the survey questions prior to distribution to participants.

Increased understanding of drowsy driving knowledge, attitudes, and behaviors will allow the NHTSA and related agencies to improve drowsy driving programs, which should in turn improve safety on America's roads for all. The AAHS supports this survey and other activities that will further address drowsy driving but encourages NHTSA to consider the concerns that have been outlined above.