



Safety Research & Strategies, Inc.

340 Anawan Street / Suite 200

Rehoboth, MA 02769

Ph. 508-252-2333, Fax 508-252-3137

www.safetyresearch.net

November 20, 2007

Kevin Mahoney
Corporate Customer Services
National Highway Traffic Safety Administration
400 7th Street, SW
Washington, DC

RE: Technical Information Services

Dear Mr. Mahoney:

I am writing to express concern about availability of documents and the long-term preservation of agency records through the Technical Information Services at NHTSA. We are particularly concerned about the loss of historical materials and continued public access to these materials, especially as your agency prepares to move to a new facility.

Safety Research & Strategies (SRS) is a research, consulting and advocacy firm specializing in motor vehicle safety issues. Our clients include lawyers, supplier and technology companies, government, and media. We work with organizations and individuals who share our goals of improving safety and reducing harm in the motor vehicle and transportation environment. We routinely prepare comments on rulemaking and provide the agency with data on vehicle safety defects.

As frequent and long-time users of TIS we understand the significant, and often thankless role this part of the agency performs. They provide a valuable and useful service. Our organization, along with many others have come to rely on TIS Reading Room as a resource—often the only resource—for access to historical documents related to the agency's regulatory, investigative, and policy history. We are grateful to the TIS staff, who over the years, have worked to preserve this important history. We have witnessed many changes to this division. Some changes have been very useful, while others have created decreased access to information, reduced document availability, and ultimately increase the need for FOIA requests, which create a much greater burden on the agency. We are concerned about the potential loss of access to public information within the TIS Reading Room, that decisions on which documents may be brought to the new building from the Reading Room do not consider the effects that it could have on public accessibility to retrieve information.

What may appear to be minor changes or elimination of duplicative materials, can create significant changes to the public's ability to research NHTSA's rulemaking. For instance, notebooks with NHTSA Federal Register notices were removed from the TIS Reading Room

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without any notice. These notebooks were key to rulemaking research, particularly when references are incomplete—which they frequently are. The notebooks were thoughtfully arranged and allowed browsing NHTSA notices by year. Now it is virtually impossible to browse the FR, since there is no yearly index. In place of these easy references, one must review each and every daily publication in order to locate an incomplete reference.

It is our understanding that some documents that reside in TIS, exists at the Suitland Records Center or the National Archives, this too is of great concern as their systems are enormously inefficient and much more cumbersome for the public to use. The National Archives houses documents from all branches, agencies, and organizations within our government. Documents are housed in boxes with general and imprecise indexing that require an enormous amount of time to obtain, again reducing public accessibility. The files at the Suitland Records Center are not public domain, an agent of NHTSA has to grant permission for records center staff to retrieve records for public viewing for each visit.

We have witnessed reduced availability to Vehicle Owner Questionnaires (VOQs). Currently some are available online through the Artemis system, but there are a large amount of gaps in that database, and a large number of these documents are now missing despite being previously available on the now-defunct MSI system. Some of these missing documents are allegedly now on the Alchemy system, which is inaccessible to the public. There are some compliance tests and other important documents that should be but are not available on Artemis.

As you know, customers of the TIS include a wide range of users from advocacy and public interest organizations, researchers, and industry. It is remarkable how many *current* issues can only be thoroughly understood and analyzed with the benefit of historical materials, again, many of which are only available at TIS.

While we understand the need to consolidate information and streamline inefficiencies, we request that our organization, and other users of TIS who understand the substantive importance of the materials, have the opportunity to communicate our concerns and to assist you and the TIS staff in any way possible to ensure a smooth transition.

Please let me know when we may be able to schedule a meeting to discuss these issues with you.

Sincerely,

Sean E. Kane

CC Margaret O'Brien, Chief Information Officer
Kevin Ball, TIS Director