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U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building
Room W12-140
Washington, DC 20590

Request for Comment: Motorcycle Crash Avoidance Technology Review (Docket ID No. NHTSA–2024–0024)

The American Motorcyclist Association (AMA) submits these comments to the NHTSA-2024-12798 notice published in the June 12, 2024, *Federal Register*. We support the National Highway Traffic Safety Administration seeking public comments on issues regarding motorcycle safety and safety technology. Collecting direct feedback from the motorcycling community regarding motorcycle safety technology is an important exercise for NHTSA particularly if the agency is considering any safety associated technology or equipment mandates.

Founded in 1924, the nonprofit AMA is the premier advocate of the motorcycling community, representing the interests of millions of on- and off-highway motorcyclists and all-terrain-vehicle riders. Our mission is to promote the motorcycle lifestyle and protect the future of motorcycling. Motorcyclists continue to share concerns regarding autonomous vehicle (AV) technology and the ability of these systems to properly detect and respond to motorcycles. For example, in April 2024, NHTSA finalized a rule that will make automatic emergency braking (AEB) standard on all passenger cars and light trucks by September 2029. In this rulemaking NHTSA, notes it "does not have data on how AEB systems would respond to other vehicle types such as heavy vehicles or motorcycles." As concerns about these unproven AV technologies grow in the motorcycling community, the Department should carefully consider the goals and intentions of this rider survey.

The AMA welcomes feedback from our membership and understands the value opinions from everyday riders can have on policymaking. However, as the Department considers undertaking this survey it is important to note much of this information and similar safety recommendations are available from other NHTSA organized initiatives. In March 2024, NHTSA hosted the first of seven meetings to update the National Agenda for Motorcycle Safety (NAMS). The NAMS Community of Practice members provide a range of safety and industry expertise that includes multiple disciplines of motorcycling. Based on discussion among these experts, the NAMS update will provide an abundance of information on how to best implement safety features. This document also aims to offer further research opportunities and may well introduce additional issues to consider prior to the survey's commencement.

Additionally, on June 17, 2024, NHTSA named 13 members to the newly reestablished [Motorcyclist Advisory Council](#) (MAC). To quote the news release announcing the MAC, "the 13 members bring a variety of stakeholder perspectives to the council, including from state transportation departments,

motorcycle riders' organizations, road safety associations, nongovernmental groups, researchers, and road engineers. As part of its charter, the council will coordinate with and advise the Secretary of Transportation, NHTSA, and the Federal Highway Administration on transportation issues specific to motorcyclists, including motorcycle and motorcyclist safety, barrier and road design, construction and maintenance practices, and the architecture and implementation of intelligent transportation system technologies."

If the goal of NHTSA is to collect information on what technology works best for a Safe Systems Approach, the MAC with guidance from the NAMS, is well positioned to provide these very recommendations.

In this notice the Department outlines the objective to reach 700 individuals willing to initiate the survey with the final desired sample size of 300. The notice does not acknowledge or provide a plan to equally target different types of motorcyclists. Input from the motorcycling community will differ depending on number of years riding, number of miles traveled per year, type of motorcycle, on or off-road riding, engine size, safety training history, and crash history. It is likely this survey will fall short of the intended goal without considering how these criteria will influence responses.

Likewise, many safety technology features are relatively new and more available on certain types of motorcycles. These issues should be considered before conducting a survey given the relatively recent implementation of safety features and the variety of motorcycle disciplines. Riders are often hesitant to embrace new technologies. For example, ABS, traction control and tire pressure monitoring systems are all commonplace but still face skepticism in certain riding segments. Mandating specific technologies is not the answer, and in some cases, can actually introduce unintended safety concerns under certain conditions.

Motorcyclists have been an integral component of daily transportation and recreational activity on our public roads and highways for over a century. The AMA has an indelible history of protecting access for motorcyclists to our transportation infrastructure. Motorcycles meeting federal design, safety, sound and emission requirements operate legally on our public roadways. The issue of safe access is also directly related to the high cost of licensing, ownership and fuel taxes, including the substantial expense to the motorcycle consumer of meeting state and federal laws pertaining to safety and emissions in the manufacturing process. Additionally, motorcyclists are and have been direct contributors to both the building and policing of our highway systems and hence contribute directly to the safety of all motorists.

Any survey must be carefully targeted and designed to avoid excluding specific riding segments, while also presenting a fair picture of what potential mandates are under consideration. The majority of riders support consumer choice and, given the option, may in fact purchase motorcycles offering these new technologies, but when they are reminded of the increased cost to purchase and maintain these vehicles, they may simply choose to delay buying a new motorcycle or chose the more cost effective models.