



Motorcycle Riders Foundation

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August 8, 2024

Sophie Shulman
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Agency Information Collection Activities; Notice and Request for Comment; Motorcycle Crash Avoidance Technology Review (Docket ID No. NHTSA–2024–0024)

Dear Deputy Administrator Shulman,

On behalf of the Motorcycle Riders Foundation (MRF), thank you for the opportunity to submit comments regarding a survey related to motorcycle crash avoidance technology.

The MRF provides leadership at the federal level for state motorcyclists' rights organizations as well as motorcycle clubs and individual riders. The MRF is chiefly concerned with issues at the national and international levels that impact the freedom and safety of American street motorcyclists. The MRF is committed to being a national advocate for the advancement of motorcycling and its associated lifestyle and works in conjunction with its partners to help educate elected officials and policymakers in Washington D.C. and beyond. As such, the MRF and its network of over 250,000 motorcyclists are compelled to offer the following comments.

We applaud the National Highway Traffic Safety Administration (NHTSA) for attempting to understand the views of motorcyclists regarding crash avoidance technology. All too often, motorcyclists are an afterthought when it comes to developing federal policy on issues that impact us. In this case, because the technologies being discussed are ones that would impact our riding experience, we appreciate that NHTSA is seeking to survey riders.

Two key points should be noted regarding the proposed survey. First, we believe that any survey should be truly openminded in design. Questions or phrasing that push respondents to side with certain safety features should be avoided. As these findings will likely shape NHTSA's policy making choices and result in manufacturers mandates, we encourage a fair and neutral survey. A survey with the intent to reaffirm predetermined policy outcomes would have no value. We hope that the survey design will seek to understand how riders feel about their motorcycles and



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what they want and expect from the machines they ride and purchase. A survey that is fair minded and open to any results is ideal.

Secondly, the motorcycling community is not monolithic. We have an extremely diverse number of motorcyclists in this country. Those that create the survey and select respondents should understand that not all motorcyclists are alike. While not an exhaustive list, some factors that should be considered when selecting survey respondents include:

- Types of Motorcycles they Currently Ride
- Engine Size
- Number of Motorcycles Owned
- Number of Years Riding
- Average Number of Miles Ridden Annually
- Total Number of Lifetime Miles Ridden
- Motorcycle Safety Training History
- Geographic Location
- Age
- Crash History

According to the notice posted by NHTSA, 300 completed surveys are anticipated. We are concerned that number may not adequately capture the true sentiment of motorcyclists from coast to coast. While expanding the survey would likely cost more money and take longer, the results would capture more voices and expand the depth of data returned.

We look forward to the results of the survey and the continued dialogue between NHTSA and the millions of motorcyclists on our nations roadways.

Sincerely,

Kirk R. Willard
President, Chairman of the Board
Motorcycle Riders Foundation