

My comments are mainly regarding Motorcycle Safety Guideline No. 3.

### III. Motorcycle Operator Licensing

I do not believe that it would be unreasonable to recommend that states require a point-of-sale license endorsement check in addition to the recommended cross-referencing of license endorsements with motorcycle registrations.

### V. Motorcycle Operation Under the Influence of Alcohol or Other Drugs

In addition to the recommendations listed, NHSTA should recommend that states enact a lower BAC limit for motorcyclists when operating a motorcycle. For instance, in many states, the current BAC to be considered impaired is 0.08%. I don't believe it would be unreasonable to set the limit for legal impairment when operating a motorcycle at half the level for other drivers - 0.04% BAC in my example.

### IX. Motorcycle Rider Conspicuity and Motorist Awareness Programs

NHTSA should recommend that states either strongly encourage or require the use of headlight modulators on all motorcycles manufactured after some date certain. Daytime use of motorcycle headlights has been required since 1975, but today, motorcycle headlights are getting lost in a sea of daytime running lamps and are less effective as a conspicuity device. Headlight modulators get motorcycles noticed, and as they are already legal to use in all 50 states, requiring them to be installed on new bikes would appear to be a prudent move.

NHTSA should take a stronger position on the education of motorists to the issues surrounding motorcycling. Motorist awareness (or lack thereof) is a major issue facing every motorcyclist in The United States. For instance, consider that the largest single type of multiple vehicle collision, car vs. bike, involves the car turning left in front of the bike. Lane intrusions, tailgating, pulling out suddenly in front of a bike, etc., by cars and trucks are all issues that motorcyclists face daily. NHTSA should STRONGLY encourage the states to enact AGGRESSIVE education and information campaigns, specifically targeted at the non-motorcycle riding motoring public, with special emphasis being placed on new drivers currently enrolled in driver education.

### Impaired Driving Guideline No. 8

I firmly believe that NHSTA should take a strong position on, and encourage the states to take an equally strong position on DISTRACTED driving as a subset of impaired driving. Several studies have shown, for instance, that a driver talking on a cell phone (handsfree or standard, doesn't matter) has nearly the same reaction time problems and decision making deficiencies as a drunk driver. The massive influx of cell phones, in-car video entertainment systems, GPS navigation systems, etc. represents, in my opinion, a serious threat to the safety of all people on the road. In addition, many newer cars today are being built with better sound and vibration insulation and softer suspension systems that serve to effectively isolate the driver from his or her surroundings. The combination of this isolation and the new distraction devices within the automobile is a deadly one.

NHTSA should recommend that the states enact strong laws that either outright ban the use of driver-distracting devices or seriously limit their use while driving. Drivers who violate these laws should be subject to sanctions similar to those levied against drink and drug impaired drivers. In short, NHTSA should strongly advocate the idea that distracted driving IS ACTUALLY IMPAIRED DRIVING.