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DEPARTMENT OF  
TRANSPORTATION  
DOCKET OPERATIONS

AmericanMotorcyclist.com

April 6, 2015

2015 APR 13 10:06

U.S. Department of Transportation  
Docket Operations  
M-30  
West Building Ground Floor  
Room W12-140  
1200 New Jersey Ave., SE  
Washington, D.C. 20590

Re: FHWA USDOT-2013-0053

To Whom It May Concern:

The American Motorcyclist Association supports the Federal Highway Administration's Every Day Counts Initiative that ensures safe road surfaces for all highway users, including motorcyclists. Founded in 1924, the AMA is the premier advocate of the motorcycling community, representing the interests of millions of on- and off-highway motorcyclists. Our mission is to promote the motorcycle lifestyle and protect the future of motorcycling.

Motorcycles have a markedly smaller impact on America's roads and bridges than do passenger cars, light trucks and heavy commercial vehicles. Encouraging the use of motorcycles on our roads and highways holds the potential to increase the longevity of road surfaces and lessen the burden of maintenance and repairs.

Additionally, motorcycle safety should be a high-priority consideration during the planning, development and construction of new road systems and in all road-repair and road-improvement projects. Road design and construction are important components that can improve motorcycle safety while helping the FHWA achieve its goal of reducing the number of motorcycle-related injuries and fatalities.

Special consideration also is required during periods of construction when the use of certain temporary materials can create changes in the road surface that can be dangerous to motorcyclists, who rely on consistent friction and traction to maintain vehicle control. However, in the FHWA's response to the AMA's letter dated Jan. 7, the FHWA states that it does not require friction tests as part of its pavement policy. That policy (23 C.F.R. § 626.3) covers all road users and states: "Pavement shall be designed to accommodate current and predicted traffic needs in a safe, durable, and cost effective manner." Moreover, the webpage for

<sup>1</sup> Federal Highway Administration's response to the AMA's Jan. 7 letter, [http://www.americanmotorcyclist.com/Libraries/Rights\\_Documents\\_Federal/DOC013014.sflb.ashx?download=true](http://www.americanmotorcyclist.com/Libraries/Rights_Documents_Federal/DOC013014.sflb.ashx?download=true)

the FHWA's Every Day Counts Initiative 2012 (High Friction Surface Treatment) does not mention motorcycles, although it does address the safety needs for bikes, buses and pedestrians.<sup>2</sup>

Reducing traffic crashes involving motorcycles and decreasing the number of motorcycle operators and passengers injured or killed each year is a top priority of the AMA. Through a comprehensive approach that entails promotion of rider education, use of personal protective equipment, increased motorist awareness, discouraging impaired motorcycle operation and ensuring safe riding surfaces, the AMA seeks to enhance motorcycle safety and promote the use of motorcycles for transportation and recreation.

Therefore, the AMA strongly recommends that 23 U.S.C. § 109 be amended to reflect the safety of motorcyclists. Specifically, we recommend the following:

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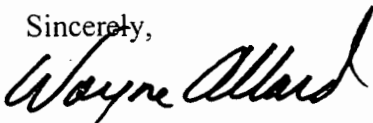
*(o) It is the intent of Congress that any project for resurfacing, restoring, or rehabilitating any highway in which Federal funds participate shall be constructed in accordance with standards that take the safety of motorcyclists into consideration.*

Additionally, the AMA strongly recommends the EDC Initiative's High Friction Surface Treatment section include standards that reflect concern for the safety of motorcyclists.

With the safety of motorcyclists the utmost priority of the AMA, we are willing to work with the FHWA and other stakeholders.

Thank you for your time and consideration of our comments.

Sincerely,



Wayne Allard  
Vice President, Government Relations

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<sup>2</sup> <http://www.fhwa.dot.gov/everydaycounts/edctwo/2012/friction.cfm>, accessed on Apr. 6, 2015