



American Association of Motor Vehicle Administrators

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Docket Management Facility (M-30)
U.S. Department of Transportation
West Building, Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

RE: Federal Motor Vehicle Safety Standards; Motorcycle Helmets – NHTSA-2015-0045-0001

The American Association of Motor Vehicle Administrators (AAMVA) appreciates the opportunity to comment on the issue of motorcycle safety and rider protection. AAMVA has long been a steward in advancing the safety of all operators, and appreciates the National Highway Traffic Safety Administration's (NHTSA) continued partnership with AAMVA in protecting motorcycle riders and saving lives.

In 2009, AAMVA, in conjunction with NHTSA, released the Guidelines for Motorcycle Operator Licensing. That joint publication specifically addresses mandatory helmet and eye protection use. Section 1-5 states:

Mandatory Helmet and Eye Protection Use: All permit holders should be required to wear helmets that meet Federal Motor Vehicle Safety Standards (FMVSS) 218 and eye protection that meets the Vehicle Equipment Safety Commission Regulation (VESC-8) during the learning phase.

This citation to the FMVSS being modified through the Notice of Proposed Rulemaking (NPRM) reflects AAMVA's commitment to protecting motorcycle riders.

In the 2015 AAMVA Motorcycle Operator Manual, AAMVA further endorses the selection and wearing of protective gear that is compliant with the U.S. Department of Transportation. This publication reiterates that riders should ensure that they are utilizing a DOT compliant helmet, and to check the label attached to the helmet stating the manufacturer's name and/or brand, model, and states that it is DOT, FMVSS No. 218 Certified.

AAMVA endorses these changes to the safety standard to deter use of novelty helmets as protective equipment. AAMVA thanks you for the opportunity to comment and supports NHTSA in this initiative to save lives.

Respectfully,

Ian Grossman
AAMVA Vice President of Member Services and Public Affairs

An International Safety Association of Motor Vehicle and Law Enforcement Administrators

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