

August 14, 2019

Re: Autonomous Vehicles/Self-Driving Car Legislation

To Whom It May Concern:

Harley-Davidson Motor Company, the American Motorcyclist Association and the Motorcycle Riders Foundation support your work to gather stakeholder feedback during the bipartisan, bicameral process to develop autonomous vehicle (AV) legislation.

There are currently almost nine million registered motorcycles in the U.S. The motorcycle community strongly supports AV legislation that includes comprehensive safety standards, appropriate federal government oversight, and industry accountability. Performance standards must be included as well, such as a “vision test” for driverless vehicles which will ensure the vehicle can properly identify and respond to its surroundings, including other cars, motorcycles, pedestrians and cyclists, as well as road markings and traffic signs. Additionally, we recommend legislation include the following:

Rulemaking – Set new standards specific to seeing, detecting and properly reacting to motorcycles;

Testing – Ensure motorcycles are part of all testing and development procedures;

Advisory committees – Public user advisory committees should include a representative from the motorcycle community and a motorcycle manufacturer;

Consumer education –Require a public, easily accessible and searchable database where consumers can look up important safety information such as the limitations and capabilities of different products offered by AV manufacturers or service providers, as well as clarifications for marketing terms such as auto pilot, super cruise, etc. For example, the database should inform consumers what each relevant automakers’ systems Auto Pilot can and cannot do in terms of the driving task;

Safety Evaluation Reports – AV manufacturers must be required to detail and make public how their vehicles identify motorcycles among other road users. Manufacturers must also include human error analysis in safety reports; and

Crash data/reporting – AV manufacturers must report incidents between AVs and motorcycles just as they would incidents between AVs and other road users. Manufacturers must also include human error analysis in crash data and reporting.

Thank you for taking the time to review and consider our recommendations. We look forward to continuing to work with the Committee as you craft this important legislation.

Sincerely,

APRIL CANTER, MPA Manager, Government Affairs Harley-Davidson Motor Company 202-304-8749 April.canter@harley-davidson.com	MICHAEL SAYRE Government Relations Manager American Motorcyclist Association 202-220-1393 msayre@ama-cycle.org	TIFFANY CIPOLETTI Director of Operations Motorcycle Riders Foundation 202-546-0983 tiffany@mrf.org
---	--	--

Harley-Davidson Motor Company (HDMC) was founded in Milwaukee, Wisconsin, in 1903. Since the first production motorcycle was built and sold, HDMC has maintained both its headquarters as well as a significant manufacturing presence in Wisconsin. Harley-Davidson fulfills dreams of personal freedom by leading the innovation of two-wheeled mobility. The company offers an expanding range of leading-edge, distinctive and customizable motorcycles and brings the brand to life through Harley-Davidson riding experiences and exceptional motorcycle parts, accessories, riding gear and apparel.

Since 1924, the American Motorcyclist Association has protected the future of motorcycling and promoted the motorcycle lifestyle. AMA members come from all walks of life, and they navigate many different routes on their journey to the same destination: freedom on two wheels. As the world's largest motorcycling organization, the AMA advocates for motorcyclists' interests in the halls of local, state and federal government, the committees of international governing organizations, and the court of public opinion.

The Motorcycle Riders Foundation (MRF) provides leadership at the federal level for states' 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 and beyond.

Cc: Cherilyn Pascoe (Commerce)  
Kevin Cummins (Commerce)  
Jared Bomberg (Commerce)  
Ellen Beares (Commerce)  
Alison Graab (Commerce)  
Victoria Lombardo (Commerce)  
Andrew Neely (Commerce)  
Chance Costello (Thune)  
Catherine Barrett (Peters)

