



Motorcycle Riders Foundation

P.O. Box 9090, Peoria, IL 61612

(202) 546-0983 / mrfoffice@mrf.org / www.mrf.org

January 31, 2024

Office of the Secretary
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580

Re: Docket Number FTC–2023– 0077

Dear Acting Secretary Christie,

On behalf of the Motorcycle Riders Foundation (MRF), thank you for the opportunity to submit comments regarding the petition for rulemaking submitted by the US Public Interest Research Group and iFixit. We support the push for federal action on the right to repair and have championed efforts in Congress to address this issue. In keeping with that support, we believe action by the Federal Trade Commission to protect the rights of consumers is warranted.

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 and beyond. As such, the MRF and its network of over 250,000 motorcyclists are pleased to offer the following comments

Motorcycles are a unique and key component of our transportation system. Rising fuel prices and increased congestion have seen Americans continue to turn to motorcycles as a reliable, fuel efficient, and affordable means of transportation. Recent statistics gathered by the Insurance Institute for Highway Safety (IIHS) show nearly 8.8 million registered on-road motorcycles in this country. That number is nearly double the 4.3 million registered in 2002.

What is striking about those numbers is that, according to the IIHS, "The average age of registered motorcycles has increased from 9.0 years in 2002 to 14.3 years in 2023. Half of motorcycles registered in 2023 were at least 14 years old."¹ Consumers are clearly choosing to hold onto their motorcycles longer which requires more maintenance and repairs.

¹ <https://www.iihs.org/api/datastoredocument/bibliography/2288>



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The motorcycling community is not limited to just riders. The support system around motorcycling includes aftermarket parts dealers, who have for over 100 years provided the parts and expertise to repair and improve bikes. The ability to work on one's motorcycle(s), customize, repair, and rebuild it is a critical part of motorcycling.

Limiting access to the parts, tools, and information needed to repair motorcycles would be devastating. It will also cause unknown economic damage to the thousands of small businesses across the country that service and maintain the nearly 9 million motorcycles on our roads.

A vibrant after-market industry is critical to sustaining motorcycling in this country. Without access to the parts, tools, and information needed to repair motorcycles, this unique part of American culture could be lost.

In half a dozen states, legislative action on the right to repair is promising but also leads to a patchwork system of laws. Without a federal standard, consumers, repair shops, and original equipment manufacturers are left to navigate a maze of regulations that vary across the country. National standards and guidelines would fix this.

We are also concerned that private entities have agreed to and continue to tout the "Right to Repair National Memorandum of Understanding." These arrangements do not include motorcycles and thus leave bikers out of any agreement to protect consumers.

Our concerns about the right to repair are not without merit. For nearly 40 years the MRF and its members have traveled the country meeting with, talking to, and learning from bikers from coast to coast. We understand the mindset of the American street rider and fear limiting access to parts, tools, and information will destroy a vibrant and distinctively American lifestyle. For all these reasons we support efforts by the FTC to create national standards that protect consumers' right to repair.

Thank you for your consideration,

Kirk Willard
President, Chairman of the Board
Motorcycle Riders Foundation