



Motorcycle Riders Foundation

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October 19, 2023

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Request for Comment on Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027– 2032 and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030–2035 (Docket ID No. NHTSA–2023–0022)

Dear Acting Administrator Carlson,

On behalf of the Motorcycle Riders Foundation (MRF), thank you for the opportunity to submit comments regarding the proposed changes to the Corporate Average Fuel Economy Standards (CAFE) for model years 2027-2032.

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 compelled to offer the following comments.

We are concerned that these proposed standards are yet another attempt by the Biden Administration to eliminate the internal combustion engine (ICE). The proposed changes to CAFE standards cannot be viewed in a vacuum. Recent proposals by the Environmental Protection Agency (EPA) on tailpipe emissions, which will effectively force 67% of new cars to be zero emissions, are another example of the attack on ICE. Add to that the actions by the State of California, which the Administration has defended, that restricts the sale of ICE over the next decade are extremely worrisome.



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It is clear, that by dramatically increasing CAFE standards, NHTSA is attempting to blackmail manufacturers into allocating more resources to electric vehicle production. This, in and of itself, we find problematic. We at the MRF are strong believers in the free market. Not only do we believe that manufacturers should have the right to build and sell the products they choose, but consumers should also be free to decide what they buy. NHTSA is picking winners and losers in the marketplace, something we strongly object to.

While these regulations are focused on cars and trucks, we as motorcyclists know that we will eventually bear the brunt of these policy decisions. We cannot maintain our iconic American lifestyle if manufacturers and fuel providers are forced out of the marketplace. We will become a casualty of this Administration's war on ICE. It is ironic that motorcycles, which provide a fuel efficient, congestion relieving, and affordable mode of transportation for millions of Americans, will be destroyed in a pursuit of fuel and emissions goals.

The motorcycling community is not limited to just riders. The support system around motorcycling includes aftermarket parts dealers, who, for over 100 years, have provided the parts and expertise to modify and alter bikes. The ability to work on one's motorcycles, customize, repair, and rebuild them, is a critical part of motorcycling. A shift away from ICE will destroy that unique part of our lifestyle and a historic part of American culture. It will also cause unknown economic damage to the thousands of small businesses across the nation that service and maintain the nearly 10 million motorcycles on our roads.

Therefore, we respectfully ask that the proposed increase in CAFE standards be rejected. The domino effect of these changes would be devastating to millions of Americans.

Sincerely,

Kirk R. Willard
President, Chairman of the Board
Motorcycle Riders Foundation