

Information Collection Request Supporting Statements: Part A
Motorcycle Crash Avoidance Technology Review
OMB Control No. 2127-(New)

Abstract:¹

This information collection request (ICR) is to seek approval for a one-time, voluntary, and anonymous survey of motorcycle riders to obtain consumer-reported feedback and perspectives on the use and availability of advanced crash avoidance motorcycle technologies. At this time, there is no information regarding consumer use and understanding of current advanced safety technology on motorcycles. To gain perspective on U.S. motorcyclist consumers, NHTSA will survey a convenience sample of individuals who live in the U.S., are licensed to operate a motorcycle, own at least one motorcycle, and ride it at least six times a year. Beyond these eligibility requirements, respondents will not be limited by age, geographic location, income, gender, etc. We will ask survey respondents about themselves (e.g., characteristics, riding behavior), knowledge about current and proposed motorcycle technologies, as well as their willingness to use these technologies. This information collection request is for three reporting collections: (1) an eligibility questionnaire; (2) an informed consent form; and (3) the survey questionnaire. Results from the anonymous questionnaire will be compiled into descriptive statistical summaries (numeric data) and thematic codes and narratives (text-based data from open-ended questions) and incorporated into a report will be published and available to the general public via the National Transportation Library. The results of the information collection will help NHTSA better understand consumer-based barriers and facilitators to advanced motorcycle crash avoidance technology deployment. By understanding these barriers and facilitators, NHTSA can better develop related policy and consumer education materials to improve safety through the increased uptake and safe use of advanced technologies for motorcycles. The data collection requires IRB approval and has received it: exempt status from the University of Michigan (#HUM00238521).

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal and administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

¹ The Abstract must include the following information: (1) whether responding to the collection is mandatory, voluntary, or required to obtain or retain a benefit; (2) a description of the entities who must respond; (3) whether the collection is reporting (indicate if a survey), recordkeeping, and/or disclosure; (4) the frequency of the collection (e.g., bi-annual, annual, monthly, weekly, as needed); (5) a description of the information that would be reported, maintained in records, or disclosed; (6) a description of who would receive the information; (7) if the information collection involves approval by an institutional review board, include a statement to that effect; (8) the purpose of the collection; and (9) if a revision, a description of the revision and the change in burden.

Subchapter V of Chapter 301 of Title 49 of the United States Code (U.S.C.) authorizes the Secretary of Transportation to conduct “motor vehicle safety research, development, and testing programs and activities, including activities related to new and emerging technologies that impact or may impact motor vehicle safety.” 49 U.S.C. 30182. Pursuant to Section 1.95 of Title 49 of the Code of Federal Regulations (CFR), the Secretary has delegated this authority to the National Highway Traffic Safety Administration (NHTSA).

NHTSA’s mission is to save lives, prevent injuries, and reduce the economic costs of road traffic crashes through education, research, safety standards, and enforcement activity. As crash avoidance technologies advance, they have the potential to reduce the loss of life in roadway crashes. In order to better inform the agency’s efforts regarding crash avoidance technologies for motorcyclists, NHTSA has contracted with the University of Michigan Transportation Research Institute (UMTRI) to conduct a project entitled “Motorcycle Crash Avoidance Technology Review”. The objectives of this project are to gather data and perform analysis to summarize the scope of the motorcycle crashes, estimate the prevalence of different crash avoidance technologies available in the fleet, understand the crash avoidance technologies under development, and identify perspectives on advanced motorcycle technologies. This ICR is to seek approval for a survey of motorcyclists that will be conducted as part of this project to gain understanding of users’ thoughts on these technologies and identify possible unintended consequences of mandating the technology.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This information collections will be conducted through a survey using a convenience sample and administered by UMTRI. The information collected from the survey will be compiled into a report that discusses current consumer perceptions of the utility and availability of the technologies, including consumer willingness to use and the impact of various contextual factors (e.g., personal, mandates, costs), and consumer beliefs about related concepts, such as “right to repair.” This information will be valuable in understanding consumer-based barriers and facilitators to the motorcycle technology deployment. By understanding these barriers and facilitators, NHTSA can improve safety by developing better policy and communications, such as consumer education materials, to enhance motorcycle technology uptake and safe use and, ultimately, improve motor vehicle safety.

The survey will ask respondents for background information on themselves (demographics, riding behavior, and safety habits like helmet use) to gauge whether

knowledge and beliefs about motorcycle systems differ by these contexts. The survey will ask about respondents' knowledge and beliefs regarding motorcycle safety technology using open-ended questions where respondents can type in their responses. These questions include consumer willingness to use various motorcycle technologies and their perspectives on the impact of various contextual factors (e.g., personal beliefs, mandates, costs).

- Technologies include braking systems (anti-lock braking, combined braking, automatic emergency braking); warning systems (lane departure, blind spot, curve speed, forward collision, and rear collision); and control systems (stability control and wheelie control).
- Open-ended questions aim to gather unbiased perspective and allow a measure of accuracy of information available to consumers and users. Additionally, overall thoughts on technologies provide insight into user acceptance and can be evaluated by demographics and user characteristics.
- Willingness to purchase and use technologies provides perspective for incentivized incorporation of technologies and potential disengagement or modification to make inoperative.
- Cost considerations provide insight for potential policy decisions as they relate to cost-benefit analyses.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The survey will be administered via an easy-to-use, digital online system. The survey uses skip-logic and other survey logic to reduce burden. The administration is 100% electronic with no follow-up contact to respondents. Solicitation of respondents for this convenience sample will also be electronic and internet based.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

NHTSA is not aware of any current information available to NHTSA regarding contemporary motorcycle rider profiles and perspectives on new motorcycle technologies. The limited amount of research available regarding motorcyclists' perceptions of motorcycle technologies is either outdated (as there have been significant developments in the decade since the research was published) or not U.S. based, and therefore cannot be used for the current project's purposes.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The information collection does not impact small businesses or small entities. Respondents are individuals completing the survey as they choose and at their convenience.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If this survey is not conducted NHTSA will not gain insight into the current perspectives of motorcycle users are regarding current and future technology. This survey is specifically valuable in understanding consumer-based barriers and facilitators to the motorcycle technology deployment. By understanding these barriers and facilitators, NHTSA can better develop related policy and communications, such as consumer education materials, to enhance motorcycle technology uptake and safe use.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- a. requiring respondents to report information to the agency more often than quarterly;**
- b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- c. requiring respondents to submit more than an original and two copies of any document;**
- d. requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- e. in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- f. requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- g. that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- h. requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause this collection to be collected in a manner inconsistent with 5 CFR 1320.5(d)(2).

NHTSA is requesting an exemption to the requirement at 5 CFR 1320.5(d)(2)(vi) to allow NHTSA to use a statistical data classification that has not been reviewed and approved by OMB. Specifically, NHTSA seeks to use the seven minimum categories for

race and ethnicity in lieu of collecting more detailed information as specified in Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15). While NHTSA is requesting information on the detailed race and ethnicity of the respondents, it is unknown whether there will be enough information to use the detailed data rather than the aggregated data corresponding to the minimum categories. Therefore, we are requesting to use the seven minimum categories for race/ethnicity.

Other than the request for exemption regarding SPD 15, there are no special circumstances that require this collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2).

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported.**

NHTSA published a 60-day notice on June 12, 2024, requesting comment on NHTSA's intention to submit this ICR to OMB for approval (89 FR 50042). Three comments were received during the comment period. This 30-day notice includes a summary of those comments and responses; however, there are no changes to the estimated burden as a result of the manner in which NHTSA has addressed these comments.

The Insurance Institute for Highway Safety (IIHS) "welcomes any addition to the current state of knowledge in motorcyclist safety, [they] strongly discourage NHTSA from delaying possible rulemaking on motorcycle ABS by waiting for these survey results." IIHS further supported public comment in the opportunity for individuals or organizations to provide feedback, regardless of selection for participation in the survey. The breadth of IIHS's comment was a rearticulation of their petition for rulemaking to upgrade FMVSS No. 122. IIHS did not comment on the burden calculations or methodology of the information collection at hand.

Response: NHTSA acknowledges support for the collection of additional information regarding motorcyclist safety. The proposed information collection is a one-time, voluntary, and anonymous survey of motorcycle riders to obtain feedback and perspectives on the use and availability of multiple advanced rider assistance systems. The results of the consumer survey may be considered during contemplation of future

research and Agency activities; however, they are not a necessary prerequisite for regulatory activities by the Agency. As there were no comments regarding burden calculation or methodology, no changes to the survey design or instrument are necessary based on IIHS's comment.

The American Motorcyclist Association (AMA) provided a written comment in which they "support the National Highway Traffic Safety Administration seeking public comments on issues regarding motorcycle safety and safety technology." The AMA emphasized the importance of direct feedback from the motorcycling community and expressed some previously stated concerns regarding emerging technology and interactions with motorcycles and motorcyclists. Specifically, AMA highlights the concern regarding a lack of data on how AEB systems would respond to other vehicle types such as heavy vehicles or motorcycles, as included in NHTSA's April 2024 Final Rule for automatic emergency braking (AEB). Additionally, AMA referenced the National Agenda for Motorcycle Safety (NAMS) and updates for recommendations on implementation of safety features. They also referenced the newly reestablished Motorcyclist Advisory Council (MAC) which will "coordinate and advise the Secretary of Transportation, NHTSA, and the Federal Highway Administration on transportation issues specific to motorcyclists."

The AMA offered recommendations regarding this specific survey as well. The concerns primarily focus on representation across segments of the motorcycling community based on the characteristics in Table 1. This table identifies the areas of concern as discussed by the AMA, whether the survey originally included this information for collection and analysis, if the survey instrument has been adjusted to accommodate for that data and if not, the justification for not including that data collection.

Response: The MAC and NAMS are part of NHTSA's overall strategy to improving motorcycle safety. These initiatives work together to ensure that the diverse motorcycling community is well-represented, including fair and comprehensive inclusion of all riding segments. The Office of Vehicle Safety Research, the group responsible for this information collection, will continue to work across the Department and these groups in efforts for rider safety.

As stated, the AMA noted concerns regarding differences in response based on segments of the motorcycling community. The survey is not designed to stratify respondents by population segments, but the survey is collecting information about specific rider characteristics and history. The analysis will take these data into consideration post collection. The table below provides characteristics shared by the AMA and NHTSA response regarding collection of these data.

Table 1. Recommendations by the American Motorcyclist Association

AMA Data of Interest	Originally in Survey	Change to Survey
Number of years respondent has ridden	No	Data has been added to the survey instrument
Miles travelled per year	No	Data has been added to the survey instrument
Type of motorcycle	Yes	
On- or off-road riding	Yes	
Engine size	No	Data has been added to the survey instrument
Safety training history	No	Data has been added to the survey instrument
Crash history	Yes	

NHTSA and its research partner have modified the survey questionnaire based on the above feedback from AMA. While four questions were added to the instrument, NHTSA does not believe this will change the average time of survey completion. Therefore, these modifications will not result in any changes in the burden estimates.

The Motorcycle Riders Foundation (MRF) “applauds the National Highway Traffic Safety Administration for attempting to understand the views of motorcyclists regarding crash avoidance technology”. Noting that “motorcyclists are an afterthought,” the organization states appreciation in seeking to survey riders.

The MRF subsequently offers two key points regarding the proposed survey. The first is that they believe that questions or phrasing that push respondents to side with certain safety features should be avoided and encourage a fair and neutral survey. Secondly, the MRF offers the diversity of the motorcycling community and suggests that the respondents be selected to include specific rider characteristics. Table 2 provides those characteristics included in the MRF comment. In a related statement, the MRF is concerned with the selected sample size of 300 as potentially not representing segments of the motorcycling community. The MRF did not directly request an increase in sample size but acknowledge the increase in information if the sample size is expanded. The MRF did not explicitly state concerns about the burden calculations for the information collection.

Response: NHTSA has coordinated with its research partner to ensure that the survey questions are objective, unbiased, and representative. With regard to inclusion of a broad representation of the motorcycling community, NHTSA is not collecting data in a stratified sampling methodology, rather a self-selection of riders that collects characteristics to be used during data analysis. As with the AMA comments, Table 2 shows the rider characteristics included in the MRF comment, and indication of whether that characteristic was included in the original survey instrument, and whether the survey instrument will change based on this comment.

Table 2. Recommendations by the Motorcycle Riders Foundation

MRF Data of Interest	Originally in Survey	Change to Survey
Type of motorcycles the respondent currently rides	Yes	
Engine size	No	Data has been added to the survey instrument
Number of motorcycles owned	Yes	
Number of years riding	No	Data has been added to the survey instrument
Average number of miles ridden annually	No	Data has been added to the survey instrument
Motorcycle safety training history	No	Data has been added to the survey instrument
Geographic location	Yes	
Age	Yes	
Crash history	Yes	

NHTSA and its research partner will modify the survey questionnaire based on the above feedback from MRF. The four questions added to the survey instrument are the same questions identified by the AMA. There are no additional questions added in response to the MRF comments beyond those. Therefore, no additional modifications have been

made to the questionnaire and no resulting changes have been made to the burden estimates.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There will be no compensation for the completion of the survey. Respondents are not asked to travel or obtain equipment in order to complete the survey, and the time investment is minimal and voluntary.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The informed consent procedure conforms to the requirements for an exempt, anonymous survey. A brief informed consent form is used after an eligibility screener. If participants do not meet eligibility requirements or agree to be in the study through the consent form, they are directed to an exit page.

Consent language at the beginning of the survey is as follows:

Welcome to the research study!

We are interested in understanding what motorcyclists think about new safety technologies. For this study, we will ask you about yourself, your motorcycle use, and thoughts on motorcycle safety technology. Some questions are open-ended, where you can tell us anything you would like about the topic. Type as much as you would like in the open text box.

Your responses will be kept completely anonymous and confidential.

As part of their review, the University of Michigan Institutional Review Board Health Sciences and Behavioral Sciences has determined that this study is no more than minimal risk and exempt from on-going IRB oversight (Study #HUM00238521).

The study should take you around fifteen minutes to complete. Although you will not be compensated for your participation, your information and thoughts will be used to inform new motorcycle technology policy and procedures.

Your participation in this research is voluntary. You have the right to withdraw at any point during the study without any penalty. The Principal Investigator (Kathy Klinich) of this study can be contacted at motorcycle-tech-survey@umich.edu. You may ask her any question related to this informed consent or the study.

By clicking the button below, you acknowledge:

Your participation in the study is voluntary.

You are 18 years of age.

You are aware that you may choose to terminate your participation at any time for any reason.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The survey does not contain any questions deemed of a sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information on the respondents and estimates of the annualized labor cost to respondents associated with that hour burden.**

This ICR involves three information collections: (1) an eligibility questionnaire; (2) an informed consent form; and (3) the survey questionnaire. The administration of each of these information collections is completely electronic as well as the solicitation of respondents through targeted advertisements and motorcycle community webpages. The survey involves a convenience sample and will remain available for completion until a sample size of 300 completed surveys is achieved.

Initial outreach for respondents is targeted to reach 700 individuals willing to initiate the survey (in order to arrive at the final desired sample size of 300). The landing page for the survey is a three-question eligibility questionnaire, with an estimated time for completion of one minute. As this is a new format for gathering this type of information from this community, the research team estimates that 60 percent of the individuals who take the eligibility questionnaire will qualify to move forward. As such, 420 individuals will move forward to the informed consent document. It is assumed that all 420 individuals will complete the informed consent, which is also expected to take an average of one minute.

While all 420 respondents are expected to move forward for the survey questionnaire, the research team expects some non-response and some attrition of respondents. The research team is looking for 300 completed survey questionnaires. The 420 respondents are considered the maximum number of respondents needed arrive at 300 completed survey questionnaires. A completed survey questionnaire is estimated to take, on average 15 minutes.

The survey administration software contains the ability to set quotas for response. The research team will stop the solicitation of respondents once 700 individuals have begun the eligibility questionnaire or 300 completed questionnaires are gathered.

Burden costs are calculated as opportunity costs, as these individuals are taking their own time to complete the survey. NHTSA used an average hourly wage for all occupations to estimate the opportunity costs associated with this ICR. The Bureau of Labor Statistics (BLS) estimates that the mean hourly wage for all occupations is \$31.48.²

Full administration of the survey is expected to be completed within one year and, therefore, burden costs and hours are both total and annual estimates.

Table 3: Burden Estimates

NHSTA Form No.	Information Collection	Number of Respondents	Time per response (min)	Cost per Response	Frequency of Response	Time Burden (hours)	Burden Cost (dollars)
1811	Eligibility Questionnaire	700	1	\$0.52	1	12	\$364
1812	Informed Consent	420	1	\$0.52	1	7	\$218
1813	Full Questionnaire	420	15	\$7.87	1	105	\$3,305
	Annual Burden					124	\$3,887

The total and annual opportunity cost for the administration of the survey is estimated to be \$3,887 and the total and annual burden hours for the information collections is estimated to be 124 hours.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include the cost of any hour burden already reflected in the response provided in question 12.

There is no cost to the respondents for this information collection. Respondents will not incur travel expenses nor be required to obtain equipment for completion of the survey.

14. Provide estimates of annualized costs to the Federal government. Provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support

² Bureau of Labor Statistics. “May 2023 OEWS National Occupational Employment and Wage Estimates.” *Occupational Employment and Wage Statistics*. https://www.bls.gov/oes/current/oes_nat.htm#00-0000. Accessed June 6, 2024

staff), and any other expense that would not have been incurred without this collection of information.

The cost of this survey, as a component of the contract with UMTRI is \$9,935.00. As this survey development, administration, and reporting are expected to take one year, the information collection request is for a single year. Annualized cost for the information collection is therefore the same as the cost of this component of the contract.

- 15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. If this is a new collection, the program change will be the number of burden hours reported in response to question 12 and the entire burden cost reported in response to question 13. If this is a renewal or reinstatement, the change is the difference between the new burden estimates and the burden estimates from the last OMB approval.**

This is a new information collection and would not increase the burden cost.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions as applicable.**

Result tabulations will not involve “complex analytical techniques”. Results from the anonymous data collection will be compiled into descriptive statistical summaries (numeric data) and thematic codes and narratives (text-based data from open-ended questions) and incorporated into a report will be published and available to the general public via the National Transportation Library. We expect the report will be published approximately a year after completion of the data collection.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

NHTSA is not seeking approval not to display the expiration date. The expiration date will be included at the beginning of the online survey.

- 18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." The required certifications can be found at 5 CFR 1320.9.³**

³ Specifically explain how the agency display the OMB control number and expiration date and will inform potential respondents of the information required under 5 CFR 1320.8(b)(3): the reasons the information is planned to be and/or has been collected; the way such information is planned to be and/or has been used to further the proper performance of the functions of the agency; an estimate, to the extent practicable, of the average burden of the collection (together with a request that the public direct to the agency any comments concerning the accuracy of this burden estimate and any suggestions for reducing this burden); whether responses to the collection of information

There are no exceptions to the certifications statement. In accordance with the requirement at 5 CFR 1320.9(g), a statement similar to the following will be included at the beginning of the online survey.

Paperwork Reduction Act Statement: A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2127-XXXX. The information collected on this form will be used to better understand current consumer perceptions of the utility and availability of crash avoidance technologies for motorcycles, including consumer willingness to use and the impact of various contextual factors. The information will be used to inform agency policymaking and consumer education efforts. We estimate that it will take approximately 15 minutes to complete the survey. The information collected is voluntary. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, National Highway Traffic Safety Administration, 1200 New Jersey Ave, S.E., Room W45-205, Washington, DC, 20590.

are voluntary, required to obtain or retain a benefit (citing authority), or mandatory (citing authority); the nature and extent of confidentiality to be provided, if any (citing authority); and the fact that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.