

**Department of Transportation**  
**National Highway Traffic Safety Administration (NHTSA)**  
**Information Collection Request Supporting Statement: Part A**  
***Assessing the Fit and Comfort of Motorcycle Safety Gear***  
**OMB Control Number: 2127-XXXX (New)**

*Abstract:*<sup>1</sup> NHTSA seeks approval from OMB for a new information collection request to assess the fit, comfort, and preference of motorcyclists' safety gear. The proposed study aims to address the pressing need to understand the relationship between the fit and comfort of personal protective motorcycle gear and the decision to use gear. This information collection will be a one-time voluntary collection involving assessments of motorcycle safety gear (i.e., footwear, gloves, helmets, jackets, and pants).

In 2022, there were 6,218 motorcyclists killed in traffic crashes, comprising 15 percent of all traffic fatalities and 19 percent of all motor vehicle occupant (driver and passenger) fatalities, representing a fatality rate per vehicle miles traveled nearly 22 times that of passenger car occupants.<sup>2</sup> These findings demonstrate the inherent risk of motorcycle riding and highlight the importance of wearing personal protective gear. Nonetheless, not all motorcyclists use gear on every ride.

There are many reasons why a motorcycle rider may not wear protective gear, such as a sense of "personal freedom," "It's more fun to ride without a helmet," skepticism about the protective value of helmets, and the discomfort of wearing a helmet.<sup>3</sup> Even when protective gear is worn, ill-fitting gear or improperly worn gear could compromise protection. NHTSA provides specific information on its website about finding the right fit and identifying unsafe helmets, but the extent to which motorcyclists wear helmets that fit and are worn safely is unknown. Additionally, the requirements for an effective fit may vary by the type of motorcycle, riding style, and riding positions.

To encourage greater and proper usage of protective gear, it is crucial to understand the factors contributing to non-adherence to safety recommendations. NHTSA is conducting this study to investigate riders' beliefs, attitudes, and perceptions regarding gear fit and comfort, and to assess the fit and comfort of gear in use.

The study plans to screen 1,250 riders to reach the targeted 625 study participants with an equal number of riders of standard, cruiser, sport and adventure/touring motorcycles, and seated motor scooters; gather information about the protective gear the riders use; and assess the fit and comfort of the gear. Participation will be voluntary and anonymous.

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<sup>1</sup> 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.

<sup>2</sup> National Center for Statistics and Analysis. (2024, July). *Motorcycles: 2022 data* (Traffic Safety Facts. Report No. DOT HS 813 589). National Highway Traffic Safety Administration.

<sup>3</sup> Higgins, L.L. & Turner, P. (2013). *Texas motorcycle survey, 2012* [Paper presentation]. International Motorcycle Safety Conference, Orlando, FL, United States.

Participants will be recruited at locations where riders gather such as rallies, and other organized social or training events. Study staff will observe gear worn by riders, assess the fit of one type of protective gear (i.e., footwear, gloves, helmet, jacket, or pants) per participant, and ask riders for their opinions about the fit and comfort of the protective gear type of interest (one type of gear per participant). Additionally, study staff will use a tablet to show participants a series of images of examples of the protective gear type of interest that range in protective value (e.g., half helmet, full-face helmet); the examples will include a description of the item (e.g., composition material, ventilation/waterproof features) but not the brand name. Participants will rate each example in terms of its perceived protection and the likelihood they would use or purchase it. The intention of this collection is to learn about the experiences and perceptions of riders regarding protective gear. The collected information will inform NHTSA's development of programs as it looks for ways to improve rider safety while still prioritizing rider comfort to ensure riding remains an enjoyable experience.

NHTSA will use the collected information to produce a technical report with aggregate (summary) statistics and tables only; no personally identifiable information will be retained or reported. The technical report will be distributed to audiences interested in improving highway safety.

**A.1. Explain the circumstances that make the collection of information necessary. Identify any legal and administrative requirements that necessitate the collection.**

***a. Circumstances making the collection necessary***

NHTSA's statutory mandate is to reduce deaths, injuries, and economic losses resulting from motor vehicle crashes on the Nation's highways. The agency develops, promotes, and implements educational, engineering, and enforcement programs with the goal of ending preventable tragedies and reducing economic costs associated with traffic crashes. As part of this statutory mandate, NHTSA is authorized to conduct research for the development of traffic safety programs. Title 23, United States Code, Chapter 4, Section 403 gives the Secretary of Transportation (NHTSA by delegation) authorization to use funds appropriated to conduct research and development activities. Having current data is essential to develop appropriate approaches to improve traffic safety, especially for vulnerable road users, such as motorcyclists, where data is more limited.

Motorcycle safety gear, including footwear, gloves, helmets, jackets, and pants, plays a crucial role in safety by protecting riders from injuries in crashes and while riding (e.g., from road debris), and the effectiveness of safety gear is heavily dependent on proper fit. The study is gathering information on the relationship between motorcyclist gear fit and comfort to improve rider gear choices to increase safety for this population of motorists.

***b. Statute authorizing the collection of information***

**Title 23, United States Code, Chapter 4, Section 403** authorizes NHTSA to conduct research and development activities, including demonstration projects and the collection and analysis of highway and motor vehicle safety data and related information needed to carry out this section, with respect to all aspects of highway and traffic safety systems and conditions relating to vehicle, highway, driver, passenger, motorcyclist, bicyclist, and pedestrian characteristics; crash

causation and investigations; and human behavioral factors and their effect on highway and traffic safety. See 23 U.S.C. 403(b).

**A.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 is a new collection of information. NHTSA will use the collected information to produce a technical report that presents the results of the study. The technical report will provide aggregate (summary) statistics and tables and the results of statistical analyses of the information. The technical report will be shared with State Highway Safety Offices and other stakeholders interested in improving motorcycle rider safety. The results of this project will assist NHTSA in the development of its programmatic activities aimed at improving motorcycle safety.

**A.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 information technology. Also describe any consideration of using information technology to reduce burden.**

The study will use an application installed on portable tablets for use by data collectors for entering observations and administration of the surveys to motorcyclists, as well as for informed consent and self-administered survey items. The application will be able to upload responses directly to the study database if an internet connection is available (i.e., wi-fi or cellular) or it can store responses locally if no connection is available. Once an internet connection is realized, responses will synchronize to the study database. This technology will minimize the burden on participants, improve the efficiency of collection and data management, and reduce the likelihood of data loss.

**A.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 has reviewed available literature and determined that minimal research on the use of protective gear beyond helmets has been conducted, and the reasons for using (or not using) gear are not fully understood. A study conducted in 2012<sup>4</sup> identified many reasons why a motorcyclist may choose not to wear a helmet. The most frequently cited reason was “personal freedom,” followed by hot weather and discomfort. Some cited reasons such as “It’s more fun to ride without a helmet” suggesting that some prioritize the thrill of riding helmetless over personal safety. Some reported skepticism that a helmet would protect them from injury. More information is needed on why motorcyclists do or do not use all the types of protective gear (i.e., footwear, gloves, helmets, jackets, pants) and a better understanding of how the fit and comfort of gear affects decisions to wear gear. Furthermore, little information is available on how well gear fits and is comfortable for motorcyclists, how the fit and comfort of gear is related to the propensity to use gear, and implications on safety and the protective value of gear. This study will involve the collection of information on fit and comfort of personally owned motorcycle gear, present participants with images of gear of differing protective value and ask riders about their preferences for gear.

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<sup>4</sup> Higgins, L.L. & Turner, P. (2013). *Texas motorcycle survey, 2012* [Paper presentation]. International Motorcycle Safety Conference, Orlando, FL, United States.

**A.5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

There is no burden on small businesses or other small entities for this collection of information request.

**A.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.**

Proper use of protective gear has major implications for the safety of motorcycle riders. This study intends to provide insight about motorcycle gear adherence and increase motorcyclist gear use to reduce motorcycle crash fatalities and injuries. This study will assist NHTSA to develop programs that help reduce the disproportionately high motorcycle crash fatality and injury rates. States, including State highway safety offices, legislators, and law enforcement rely on NHTSA collect data on safety related issues and develop programs that improve traffic safety.

**A.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.

No special circumstances require this collection to be conducted in a manner inconsistent with guidelines in 5 CFR 1320.5(d)(2).

**A.8. Provide a citation for the FEDERAL REGISTER document soliciting comments on requesting the collection of information, a summary of all public comments responding to the notice, and a description of the agency’s actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.**

A 60-day Federal Register notice was published on January 13, 2025 (90 FR 7, pp. 2779-2781) notifying the public of NHTSA’s intention to collect information and soliciting public input on the proposed information collection. During the 60-day comment period, NHTSA received five comments from five individuals. Each comment expressed support for the proposed information collection and two comments included recommendations for the project.

The first comment, received on January 15, 2025, expressed support for the information collection, stating “I applaud NHTSA for taking a look into the fit and comfort of motorcycle gear.” The commentator suggested including sites other than motorcycle rallies to ensure a broad representation of the collected information. NHTSA acknowledges the value and benefit of gathering information from a variety of sites. The project scope includes plans to collect information at events and sites that vary in size, content (e.g., training events, and social gatherings such as clubs) and motorcycle type of interest (e.g., seated motor scooters, cruisers, adventure/touring, and sport bikes)

The second comment, received on January 29, 2025, expressed support of the information collection, having stated that “being able to perform this study would allow for greater knowledge as to what helps in certain situations.” The commentator recommended “looking at this from the aspect of accidents and how gear has helped in that could make this study even more beneficial.” NHTSA concurs with this comment and the study protocol includes asking participants to indicate whether safety gear has provided them protection in a crash.

The third comment, received on March 12, 2025, supported the project, stating, “I applaud the NHTSA in its proposal of this study.”

The fourth and fifth comments, each received on March 13, 2025, expressed support of the project. The fourth stated, “I appreciate the initiative of NHTSA in proposing this study to gain greater insight into the decisions of motorcycle riders to use protective equipment.” The fifth stated that the commentator was “so grateful for this amazing step forward for protecting our motorcyclists on the road!”

The Federal Register notice notifying the public of NHTSA’s intent to submit this information collection to the Office of Management and Budget, and providing a 30-day comment period, was published on December 1, 2025 (Vol. 90, No. 228, pp. 55237-55240).

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

Participants will be paid \$50.00 (or provided a \$50.00 cash equivalent such as a gift card) for completing all study activities. Payment for full participation is deemed necessary to provide an incentive to participate in all levels of the study. Providing the level of incentive described above is important to ensure adequate participation rates, which are essential to the validity of the study findings.

**A.10. Describe any assurance of confidentiality provided to respondents.**

Participation in the study will be voluntary and anonymous. Participants who choose to participate in the study will complete an IRB-approved informed consent process that indicates all information provided will be anonymous and will only be stored by the assigned study identification number that cannot be linked to an individual outside of the study. All published results will provide only summary statistics that are anonymized.

**A.11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.**

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

**A.12. Provide estimates of the hour burden of the collection of information on the respondents.**

Table 1 provides the numbers used to estimate the total burden. Based on power analyses (see Part B), NHTSA anticipates approaching an estimated 1,250 potential participants with approximately 625 of those agreeing to fully participate. Full participation could take up to 30 minutes. It is anticipated that approximately 75 people will only partially participate, and the remaining 550 people will be screened but decline to participate. Total burden hours for the study will be approximately 341 hours (see Table 1). The total annual burden hours for the study are estimated to be 113.67 hours (total divided by 3).

The total amount of burden cost to respondents is estimated to be \$14,460 (see Table 2). The total annual burden cost to respondents for their participation is estimated to be \$4,820 (total divided by 3).

*Table 1. Summary of Total Burden Hours by Type of Participation.*

<b>Type of Participation</b>	<b>Number of Respondents</b>	<b>Minutes per Respondent</b>	<b>Total Estimated Burden Hours*</b>
<b>Rider Fully Participates</b>	<b>625</b>	<b>30</b>	<b>313</b>
Form 2000 – Informed Consent/Screener AND	625	1	
Form 2001 (Footwear) OR	125	29	
Form 2002 (Gloves) OR	125	29	
Form 2003 (Helmets) OR	125	29	
Form 2004 (Jackets) OR	125	29	
Form 2005 (Pants)	125	29	
<b>Rider Does Not Fully Participate</b>	<b>75</b>	<b>15</b>	<b>19</b>
Form 2000 – Informed Consent/Screener AND	75	1	
Form 2001 (Footwear) OR	15	14	
Form 2002 (Gloves) OR	15	14	
Form 2003 (Helmets) OR	15	14	
Form 2004 (Jackets) OR	15	14	
Form 2005 (Pants)	15	14	
<b>Rider Screened but Does Not Participate</b>	<b>550</b>	<b>1</b>	<b>9</b>
Form 2000 – Informed Consent/Screener ONLY	550	1	
<b><u>GRAND TOTAL</u></b>	<b>1,250</b>		<b>341</b>

Note: \* Rounded to the nearest hour.

*Table 2. Burden Estimates by NHTSA Form for the Data Collection Surveys.*

Information Collection – NHTSA Form #	Number of Responses	Burden per Response* (in minutes)	Burden per Respondent * (in minutes)	Average Hourly Opportunity Cost**	Labor Cost Per Submission	Total Burden Hours***	Total Opportunity Cost***
Form 2000	1,250	1	1	\$42.46	\$0.708	21	\$885
Form 2001	140	27.39	27.39	\$42.46	\$19.392	64	\$2,715
Form 2002	140	27.39	27.39	\$42.46	\$19.392	64	\$2,715
Form 2003	140	27.39	27.39	\$42.46	\$19.392	64	\$2,715
Form 2004	140	27.39	27.39	\$42.46	\$19.392	64	\$2,715
Form 2005	140	27.39	27.39	\$42.46	\$19.392	64	\$2,715
<b>Total</b>	<b>1,950</b>					<b>341</b>	<b>\$14,460</b>

Notes: \* Forms 2001-2005 Burden per Response/Respondent averages both the rider fully participates, and rider does not fully participate as shown in Table 1.

\*\* See May 2024 all occupations cross-industry, private, federal, state, and local government average hourly wage from the U.S. Bureau of Labor Statistics at <https://data.bls.gov/oes/#/industry/000000>; Average Hourly Opportunity Cost is inclusive of a 30% addition to the base hourly wage to account for fringe benefits (\$42.46 = \$32.66 hourly wage + \$9.80 fringe).

\*\*\* Rounded up based on individual forms.

**A.13. Provide an estimate of the total annual cost to the respondents or record keepers resulting from the collection of information.**

Participation in this study is voluntary and there are no costs to respondents beyond the time spent hearing about the study and participating in data collection if they decide to participate. Participants will incur no burden related to annual reporting or record keeping due to the collection of this new information.

**A.14. Provide estimates of the annualized cost to the Federal Government.**

This is one-time data collection. The total cost to the Federal Government for this study is \$767,238.00. This is inclusive of a contract award amount of \$754,358.00, which includes up to \$31,250.00 for study participation. Since data collection will take less than a year, the annualized cost is \$251,452.67 (total contract award divided by 3). The estimated cost in terms of government time is approximately 300 hours for the Contracting Officer’s Representative (COR) for \$9,600; and 40 hours for the Supervisor for about \$3,280 in wages. These government time costs are separate from the contract award amount.

**A.15. Explain the reasons for any program changes or adjustments in Items 13 or 14 of the OMB 83-I.**

The collection of this information is associated with a new information collection. The estimated total annual burden hours for the project are 341 hours and there are no burden costs other than the opportunity cost associated with time to participate in the study.

**A.16. For collection of information whose results will be published, outline plans for tabulation and publication.**

NHTSA will use the information from the study to produce a technical report that presents the findings. The technical report will provide only aggregate (summary) statistics and tables; no identifying information will be retained or reported. The reports will be available to the public on the NHTSA website. Resulting publications will include a caveat that data were collected from a convenience sample of volunteers, and therefore the results cannot be generalized to the population of American motorcycle riders. NHTSA will use the findings as a foundation from which to generate countermeasures for motorcycle safety.

**A.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 will display the expiration date for OMB approval.

**A.18 Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions” of the OMB Form 83-I.**

No exceptions to the certification are made.

In accordance with the requirement at 5 CFR 1320.9(g), the following statement will be provided to respondents.

*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 is necessary to help NHTSA to learn more about motorcyclists and their choice to wear motorcycle gear. We estimate that it will take approximately 30 minutes to complete. 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 SE, Room W45-205, Washington, DC 20590.*