

Motorcycle Riders Foundation

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*"The only national motorcyclists' rights organization
dedicated to on-street riders"*



January 15, 2026

Comments of the Motorcycle Riders Foundation

Docket No. NHTSA-2025-0721

Agency Information Collection Activities; Notice and Request for Comment;
Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS)

The Honorable Jonathan Morrison
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket No. NHTSA-2025-0721

Dear Administrator Morrison:

On behalf of the Motorcycle Riders Foundation (MRF), we appreciate the opportunity to provide comments on the National Highway Traffic Safety Administration's notice and request for comment regarding the Fatality Analysis Reporting System (FARS) and Non-Traffic Surveillance (NTS).

The Motorcycle Riders Foundation is a national advocacy organization representing the interests of millions of motorcyclists across the United States. For over four decades, MRF has worked to advance public policy that improves rider safety while protecting the freedoms and rights of America's motorcycling community.

The Fatality Analysis Reporting System is indispensable to the work of NHTSA and to organizations such as ours that seek to reduce fatalities through education, training, and informed policymaking. For motorcyclists in particular, FARS serves as the critical standard by which we are able to understand how, where, and why fatalities are occurring within our community.

Motorcycles are fundamentally different from passenger vehicles in terms of exposure, performance characteristics, conspicuity, and rider behavior. These unique factors mean that trends affecting motorcyclist safety are often masked when aggregated with data for other roadway users. Without a robust, accurate, and consistent FARS dataset, it becomes nearly impossible for rider organizations, researchers, states, and federal agencies to identify meaningful patterns, target resources, and evaluate the effectiveness of safety interventions.

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We recognize that FARS is not without its challenges, including the delay in the certification and public release of annual datasets. While we support efforts to modernize the system and improve the timeliness of data availability, any changes must preserve the integrity, accuracy, and year-to-year compatibility of the data. For motorcyclists, even small shifts in data definitions or collection practices can significantly distort trend analysis in a relatively small but high-risk population.

MRF strongly encourages NHTSA to seek public input on any substantial changes to FARS data elements, coding practices, or system architecture. Transparency in these decisions is essential to maintaining the trust and utility of this foundational safety resource.

FARS is the primary tool used by NHTSA to evaluate safety countermeasures and guide regulatory action. It is also the backbone of motorcycle safety research used by state motorcycle safety programs, rider training organizations, public health officials, and nonprofit advocates. Knowledge is a powerful tool: accurate fatality data leads to better education, improved training curricula, smarter infrastructure investments, and ultimately, lives saved.

In short, FARS is not simply a database to the motorcycling community—it is the yardstick by which progress is measured. The Motorcycle Riders Foundation urges NHTSA to prioritize the continued funding, accuracy, consistency, and accessibility of FARS and to ensure that the unique characteristics of motorcyclist crashes remain clearly visible within the nation's most important traffic safety dataset.

Thank you for the opportunity to submit these comments and for your continued commitment to roadway safety for all users.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kirk L. Willard'.

Kirk "Hardtail" Willard
President
Motorcycle Riders Foundation