

Comment from Zach Robertson

I am a member of the public with no direct connection to the motorcycle community or the parties involved. I am, however, a government regulator employed by another federal department. I have thoroughly read this notice.

It sounds to me that Arai's subject helmets were likely noncompliant to the letter of the regulation. However, given that the discreet size is included on the headliner and helmet packaging, combined with the required safety testing already being completed satisfactory, it seems the helmet is mostly, if not completely meeting the intent of the regulation.

If the NHTSA find this appeal to not have merit, it should probably consider issuing additional guidance to clarify their intent.