

Comment from Phillip Tyler

Hello, from a Washington Area Bicyclist, not with the Washington Area Bicyclist Association. I am writing in response to the request to NHTSA to change its estimate of the effectiveness of bicycle helmets. (NHTSA-2013-0071-0001)

Let me begin by stating that I have been in two serious bicycle crashes, both resulting in surgeries and the most recent also involving a concussion. I am a religious wearer of a helmet, I can assure you that it not only saved my skull but my life. On the occasion of my most recent crash, my surgeon informed me that I was lucky to have been wearing a helmet because my head injuries, given the nature of my other injuries that were consistent with a high-impact car crash, could have been life-threatening.

As I read the reasoning behind the change in effectiveness figures, I can't help but view them as semantics. I agree with updating the data, as it appears to be several years old, but the doubting of the data, particularly from an association of cyclists seems absurd. We know nothing is 100% effective but increasing my odds of survival by any percentage is positive. Let's not get bogged down over quantitative numbers.

I do feel, however, the response window for comments seems to indicate that the matter will not be resolved. By that I mean, the original request was submitted in 2013 and Regulations.gov gave a comment period of 86 years, ending in 2099. Is this really consistent with desiring a policy/rule change or simply performative?

Lets' take the comments and let's get an updated set of data and in the end, let's all be safe in our cycling.

Thank you for taking the time to hear/read my comments.