

# Comment from The League of American Bicyclists

Posted by the **National Highway Traffic Safety Administration** on Feb 16, 2023

Dear Associate Administrator Chen,

The League for American Bicyclists (League) writes to respectfully request that the U.S. Department of Transportation (DOT) and the National Highway Traffic Safety Administration (NHTSA) extend the deadline for their Request for Comment; Draft Model Minimum Uniform Crash Criteria (MMUCC) Guideline, Sixth Edition, published on February 2, 2023.

While the League is excited about some potential revisions in the sixth edition MMUCC, the current deadline outlined in this request for comment is just 60 days. The League requests the deadline be extended by at least 30 days. Previous DOT and NHTSA rulemaking regarding roadway and vehicle safety allowed for much longer comment request periods - ranging from 90 to 150 days to submit comments.

Given the importance of this revision of the Model Minimum Uniform Crash Criteria and the sheer number and diversity of affected stakeholders, more time is required for all parties to voice their comments and concerns. The sixth edition MMUCC will impact lives in every state and locality across the country - from everyday drivers to law enforcement agencies, advocacy groups, state DOTs and millions of roadway crash victims and their families. We ask that all stakeholders are given the opportunity to have their voices heard during this comment period.

Sincerely,

Ken McLeod  
Policy Director  
League of American Bicyclists