

education in DeKalb County, Georgia, which showed only a short-term benefit, Hawaii also suggested amendment of the introductory paragraph of the guideline to remove training from the list of "effective" programs. According to Hawaii, enforcement, rather than training, is the proper role of government. Hawaii also asked for more specificity in the guideline's recommendations concerning licensing. For example, Hawaii asked for the identification of medical criteria specific to motorcycle (rather than car) licensing. With respect to license renewal, Hawaii asked whether a knowledge test would be sufficient or whether a skills test should also be required. Finally, Hawaii asked what time frame the guideline contemplated by recommending the issuance of a learner's permit only twice per applicant.

The agencies believe that training and education are an important part of a comprehensive motorcycle safety program. Consequently, we agree with Minnesota's comment concerning the need for emphasis on the knowledge and skills of operators, and this is already reflected in the guideline proposed on January 14, 1994. However, the appropriate age for motorcycle licensing is properly a matter of State concern and, for this reason, the agencies decline to recommend actions, as urged by Advocates, that would restrict the availability of training for adolescents. The agencies do not believe that motorcycle training and education should be withheld from any segment of the population that has reached the age set by the State for obtaining a motorcycle license. Similarly, the agencies disagree with Hawaii's comment that the guideline should concern itself with testing, but not with training. A well balanced program should focus on both aspects, as currently reflected in the guideline.

The identification of specific medical criteria relevant to motorcycle licensing decisions and the nature of testing required for license renewal are also matters properly left to the discretion of the State. Consequently, the agencies have not adopted Hawaii's recommendation to provide further specifics in the guideline concerning these areas. In response to Hawaii's question regarding the issuance of learner's permits only twice per applicant, the agencies have broadened the language in the guideline to indicate that States should limit the number or frequency of learner's permits issued to any one individual.

Hawaii also disagreed with the guideline's emphasis on impaired

motorcyclists. Instead, Hawaii thought it would be more cost-effective to take a generic approach to the issue of DUI. The agencies agree that DUI is a dangerous problem regardless of the type of vehicle being operated, but believe it is important to include specific consideration of impaired motorcyclists in this guideline. The problem of impaired motorcyclists is commonly overlooked in most impaired driving enforcement programs. Focus testing conducted by NHTSA has shown that DUI messages directed at motorcyclists (a subgroup overrepresented in DUI statistics), need to be different than those directed at other motorists in order to produce the desired awareness. Consequently, it is especially important that DUI programs and activities be referenced separately in this guideline, and that they be tailored to the motorcyclist audience.

The Texas Motorcycle Safety Bureau thought that the funding source advocated by the guideline under the Program Management section should be sufficient to fund all program needs and secured from use by other state agencies. Texas noted that much additional funding would be needed to implement the all-encompassing program addressed in the guideline. Texas also recommended that the requirement for data collection be more specific, but cautioned that if it included crash data, it would fall within the responsibility of another State entity and not be allowed. Finally, Texas expressed confusion about the provision, under the section on Motorcycle Rider Education and Training, advocating "permission to spend money in other motorcycle safety program areas as deemed appropriate."

The agencies agree with Texas that the funding source sought under the guideline should be secured from use for other purposes, but believe that this is implicit in the guideline as written. With respect to the concern about the need for additional funds, we are optimistic that Texas will strive to implement comprehensive motorcycle safety programs, making the best use of the funds available. The agencies decline to further articulate the data collection requirement. States are encouraged to collect data which they determine is useful in contributing to motorcycle safety activities. The guideline does not specify responsibilities for collecting data, so Texas need not be concerned about conflicting duties among State agencies. The agencies agree with Texas' comment that the provision about spending money in other program areas

is confusing, and have deleted it from the guideline.

Revision to Guideline No. 8—Alcohol in Relation to Highway Safety

The agencies proposed that the guideline entitled "Alcohol in Relation to Highway Safety" would be renamed "Impaired Driving," and would be amended to encourage use of a comprehensive, community-based approach. Its goals would include preventing people from being killed and injured in the short-term through general deterrence programs, and permanently reducing the number of drivers impaired by alcohol or other drugs through long-term prevention and intervention measures.

The agencies received eleven comments regarding the proposed changes to Guideline 8. The National Sheriffs' Association and the New York Police Department agreed with the proposed changes to this guideline. The International Association of Chiefs of Police (IACP) supported the proposed revisions, particularly those portions that encourage the adoption of programs that emphasize the likelihood of officer-violator contact. Both the IACP and the Illinois State Police emphasized the importance of police visibility in the community.

Illinois and the Minnesota Department of Transportation strongly supported the guideline for recommending use of long-term prevention and intervention programs, such as DARE, and expressed confidence that such programs would reduce DUI/DWI levels significantly in the future.

Advocates stated that it favored the general approach and most of the details included in the proposed amendments to Guideline 8, but suggested that the agencies consider recommending that States adopt 0.05 BAC as the legal limit for the general driving public and administrative license revocation or suspension sanctions as a means to reduce impaired driving.

The agencies have not amended the guideline in response to this comment. The agencies believe administrative license revocation or suspension sanctions are already addressed sufficiently in the guideline. Section II.A recommends that States should "permit a broad range of administrative and judicial penalties and actions" and it includes in its list of "effective penalties" for impaired driving offenses the "prompt and certain administrative license revocation or suspension of at least 90 days for persons determined by chemical test to violate the State's BAC limit."