



European Commission
Directorate General for Mobility and Transport
Mr. M. Baldwin - DM 28 – 8/52
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Federation of European
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Brussels, 21 May 2019

Subject: ISA for motorcycles

Dear Mr. Baldwin,

With the new General Safety Regulation and Pedestrians Safety Regulation almost at the end of the legislative process, we are concerned about several issues.

First of all, we noticed that the (online) automotive and motorcycle press often describes one of the items of the GSR, the overridable intelligent speed assistance (ISA) as “speed limiters for cars and motorcycles”. This kind of information leads to misunderstanding and decrease of support for this safety measure. Even after corrections from our side, some magazines persisted that although motorcycles were not included yet in the GSR, they would be included at a later stage.

This brings me to the second issue. We foresee legislation that will, probably together with other safety measures, make overridable ISA mandatory for motorcycles too, even knowing that at the moment there are no such plans from the European Commission and knowing that this has no priority with safety organisations like ETSC. However, from experience we know that this will change, and we need to be prepared.

During discussions with our members it turned out that they are looking at ISA with an open mind. However, there are safety issues for the rider involved and for full support we need to clarify that. First we should establish if there is a need for ISA for motorcycles. Then research into the safety effects is needed and motorcyclists should be involved in this research and in the following discussions.

Motorcycles, as one-track vehicles, have very different riding dynamics than cars. Changes in speed, even in engine power, directly affects the handling and steering of the motorcycle and can lead to running out of a bend or loss of balance, both with a crash as result. We are willing to support, or at least not object to, ISA for motorcycles when we have the assurance that a future implementation of ISA for motorcycles will not be dangerous for motorcyclists by reducing speed by braking and/or by

reducing power. Furthermore, it should be overridable in an easy way to permit the rider to accelerate out of a corner or a dangerous situation where braking is not the best possible solution.

We invite the European Commission to confirm that the new regulations (GSR and PSR) that are recently agreed in the trilogue and are presently waiting for adoption by the Council and Parliament do not concern motorcycles and that a possible future regulation will not affect speed either by braking or by reducing engine power and will be tested to guarantee the safety of the motorcyclists.

Looking forward to your reply,

Best regards,

A handwritten signature in black ink, appearing to be 'Dolf Willigers', written in a cursive style.

Dolf Willigers,
General Secretary FEMA.