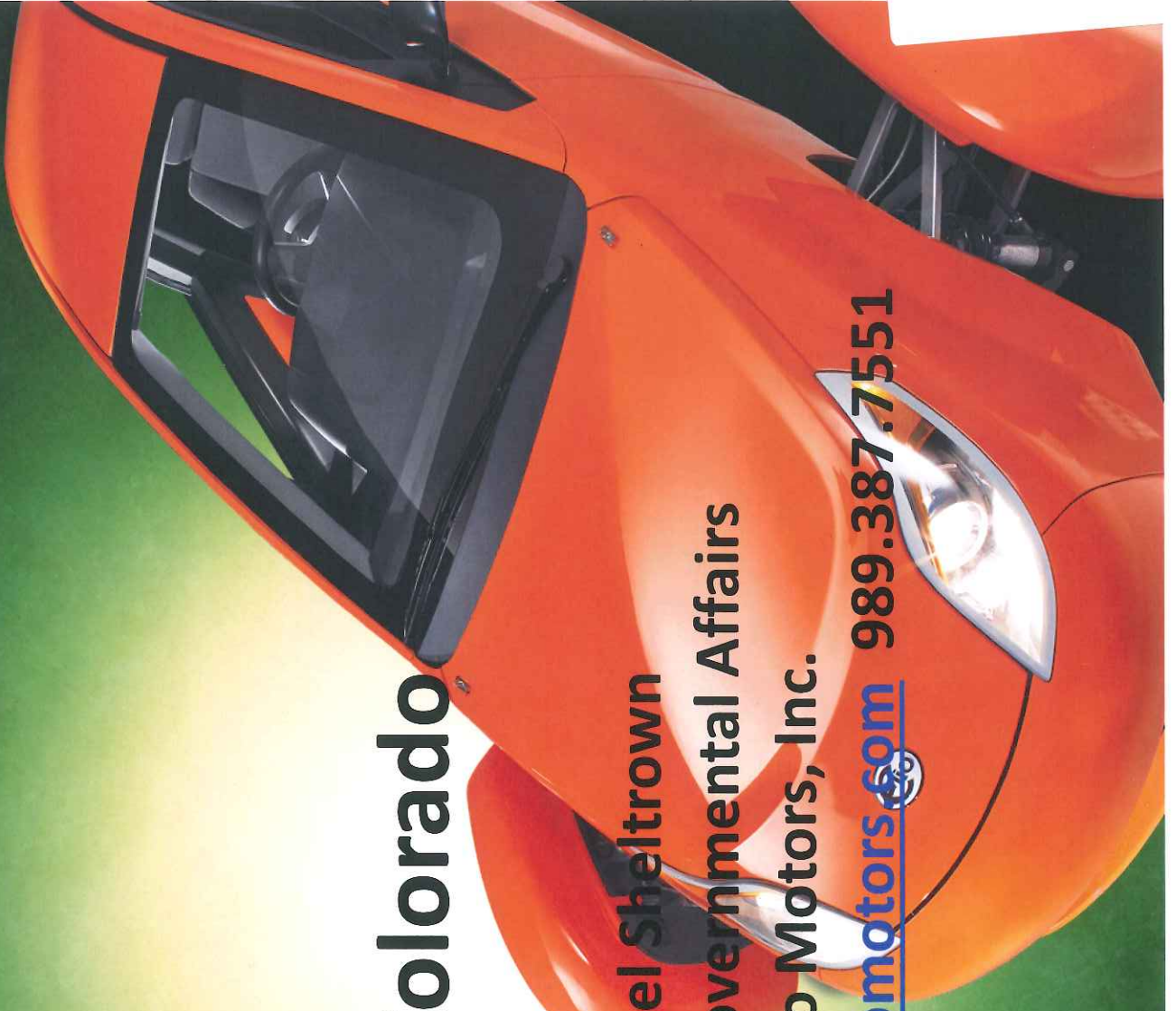


Colorado

Joel Sheltroun
VP of Governmental Affairs
Elio Motors, Inc.

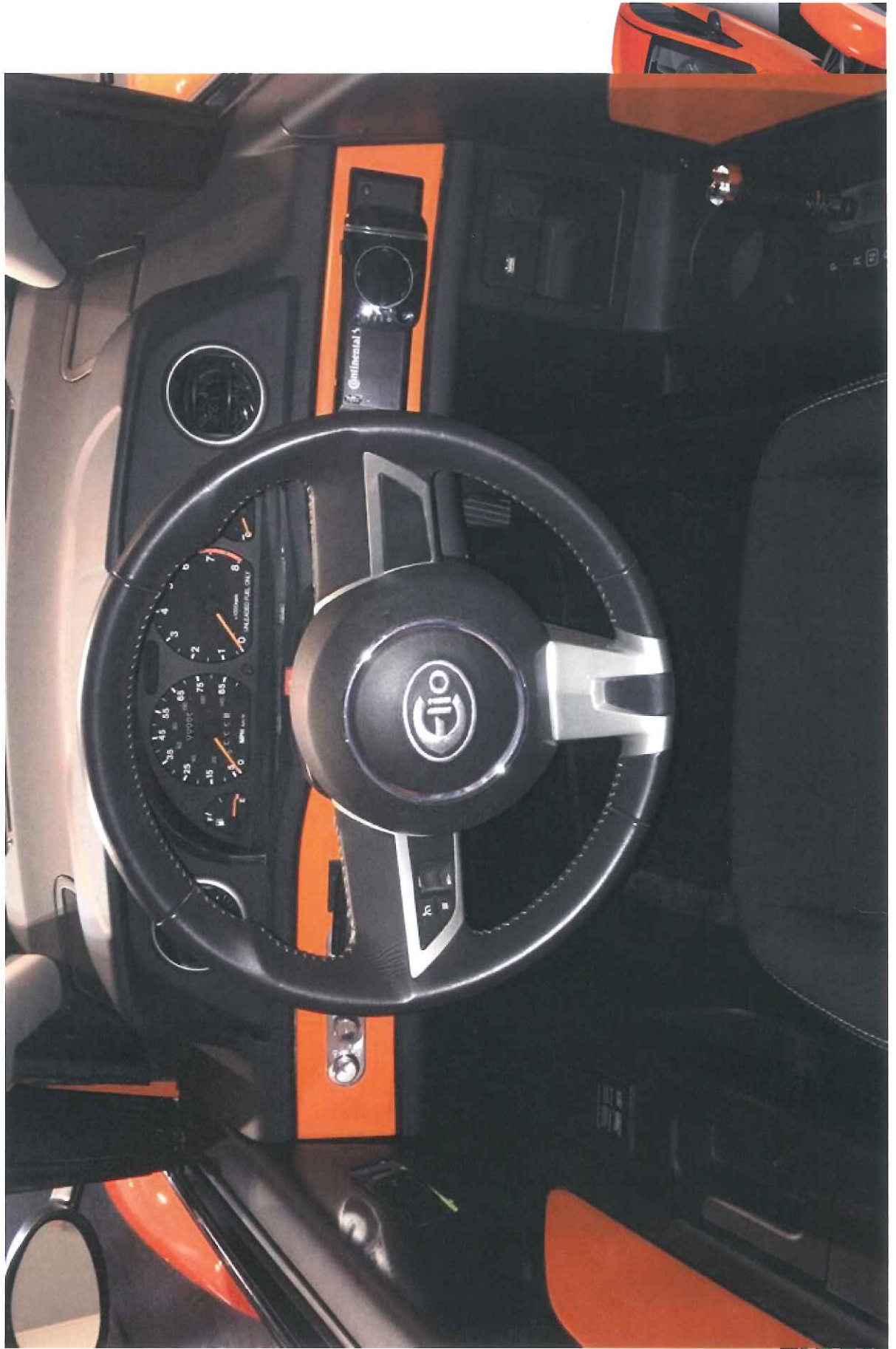
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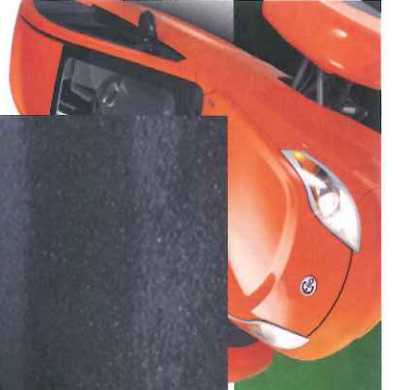
P4 Prototype



P4 Interior

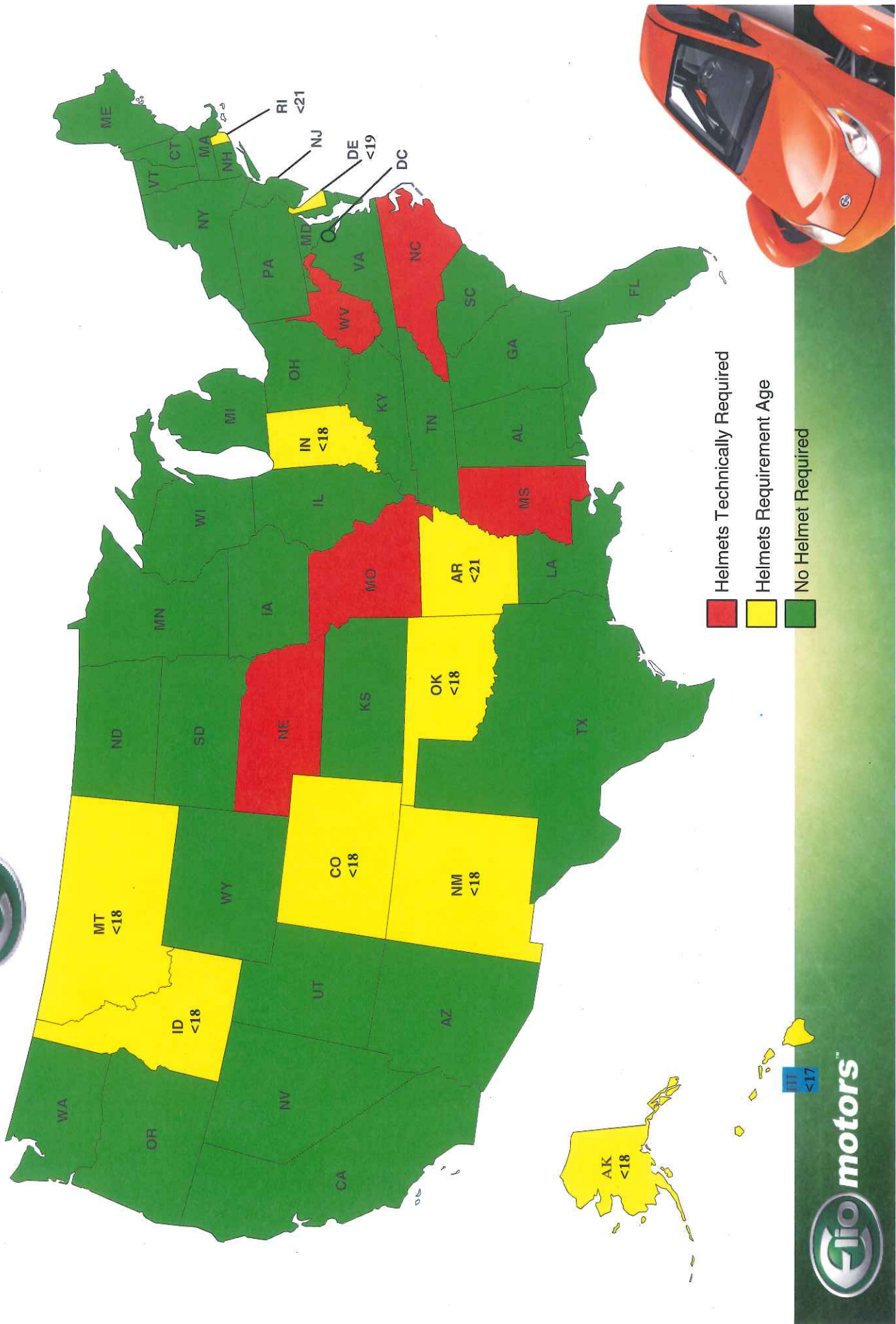


Size Comparison





HELMET LAWS - 3 WHEELED ENCLOSED



Helmet Requirement Issue

NHTSA will certify our 3 wheel vehicle as a motorcycle. Considering the motorcycle certification, there are only a few states(CO 18 and under) that technically will require helmets to be worn inside the Elio Motors autocycle even though the Elio is completely enclosed with a high strength roll cage, front and side curtain airbags, has 3 point safety restraints and is engineered and designed to Automotive FMVSS for 5 Star Safety Ratings. Requiring helmets for vehicles like ours compromises the safety of our vehicle and puts operators and passengers in jeopardy:

- 1) Wearing a helmet in a completely enclosed vehicle makes it difficult to hear emergency vehicle sirens, and other warning horns, bells, etc.
- 2) Wearing a helmet reduces vision and can create blind spots.
- 3) Our vehicle, as well as all other motor vehicles on the road today, are not designed for helmet use. Airbag deployment requires sensitive calibrations. Adding a helmet (3 – 4 lbs) adds 30 to 40% more weight to the head. *No automobile manufacturer considers helmets when calibrating airbag deployment.* The extra weight of a helmet will actually lower our Safety Rating because of neck elongation, one of the measurements considered in NHTSA Star Rating Crash Tests.
- 4) The use of a helmet with 3 point safety restraints puts the operator and passenger in a dangerous situation. The 3 point restraints hold the body against the seat, but the head (with the extra weight of a helmet), will be pulled violently forward in a frontal collision. To avoid the significant injuries resulting from this action, NASCAR drivers are using the HANS device. Of course race cars travel much faster than we do on public highways but according to NASCAR and automotive engineers, one can expect serious injury or death with speeds as slow as 30 MPH if you stop quick enough.



Motorcycle Endorsement Issue

Because of NHTSA certification as a motorcycle, CO residents driving our autocycle as well as those travelling through CO would be required to have a motorcycle endorsement on their driver's license. This requirement would create serious problems for CO residents and people traveling into or through CO:

- 1) Many states don't require motorcycle endorsements for 3 wheel enclosed vehicles. Therefore, people without motorcycle endorsements traveling in or through Colorado from other states could receive a traffic citation and have their vehicle impounded.
- 2) Our vehicle is far too wide(72") and far too long(13'6") to pass the road test. It is impossible to drive through the cones without running over them or hitting the white lines.
- 3) Autocycles have automotive controls, handle like an automobile and do not have any motorcycle equipment. Instructions as to "maintaining balance" or "leaning into the curve" do not have any value to autocycle operators.
- 4) AAMVA (American Association of Motor Vehicle Administrators) mission is to recommend "best practices" for states to follow in these situations. After over a year of investigation, AAMVA "strongly urges" states to provide exemptions for "consistency across all jurisdictions." AAMVA concluded:
 - a) Autocycles are completely enclosed and have automotive controls, not motorcycle controls.
 - b) Autocycles handle like automobiles, not motorcycles so only a automobile driver's license should be required to operate.
 - c) Autocycles should not be used for driver's license road tests.
 - d) A 7"X 4" license plate should be used.
 - e) Put "autocycle" in statute definitions.



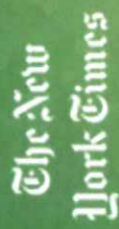
Recommendation

- Put “autocycle” in definitions as:
- “autocycle means a three wheeled motorcycle on which the drivers and passengers ride in a completely enclosed seating area that is equipped with a roll cage, safety belts for each occupant and antilock brakes and that is designed to be controlled with a steering wheel and pedals” (Some states added airbag protection as well)
- Then use the definition to exempt from motorcycle helmet and safety equipment requirements. Also use the definition to exempt from motorcycle endorsement requirements.
- The language provided in [HB1367](#) is very close to our recommendation and will correctly provide for the exemptions.





Thank you for your help in making this common sense change.



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