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Title: COO

Comments: Dear Director,

Thank you for the opportunity to comment on the United States Department of Agriculture (USDA), Forest Service proposed revisions to directives to update and clarify guidance on management of electric bicycle use on National Forest System (NFS) lands.

We support the Forest Service's efforts to issue new guidance to adapt to changing technologies and recreation patterns, manage electric bicycles in a clear and consistent way both internally and in coordination with fellow agencies, remove electric bicycles from the scope of rules that apply to motor vehicles, and allow for the use and enjoyment of electric bicycles by Americans seeking connection to natural experiences nationwide.

We are writing in support of the PeopleForBikes Coalition's comments on these revised directives. Specifically, we support distinguishing the three classes of electric bicycles to create consistency with states and other federal agencies, allowing land managers to designate electric bicycle use on non-motorized trails where bicycles are allowed, promoting the consideration of whether the effects of electric bicycle use are comparable to those of traditional bicycle use, and considering emerging technologies like electric bicycles in future access decisions.

We request one modification - that electric bicycles be removed from the definition of "motor vehicle" and considered a non-motorized use. We believe that electric bicycles are ridden, and should be managed, like traditional bicycles rather than motor vehicles.

We would also like to offer our company's individual perspective on these proposed changes.

BULLS Bikes USA has been selling bicycles since 1994. We started developing and marketing electric bicycles back in 2009. We knew right from the start this was the future. Nowadays, we are one of main premium electric bicycle manufacturers in the United States and apart from consumer sales, we have helped several first emergency responders, such as LAPD, to get a fleet of electric bicycles. The feedback from these agencies have been remarkable as electric bicycles have helped building stronger relationships between the community and the first responders.

Moreover, Americans from all over the country have found joy and excitement in the use of electric bicycles: They now get the opportunity to exercise and enjoy the pleasure of riding a bike. This has been especially interesting in places such as New York where we have a program to get first responders on electric bicycles. Not only these have helped them overcome the stress from their duties by a daily dose of exercise and enjoyment, but have also helped them avoid public transportation which could lead to an involuntarily propagation of the COVID-19 virus.

Speaking for myself, these times have given me the opportunity to ditch my car. I don't think I have driven my car for the past 2 months. Whether I had to go into work (40-mile round trip), run to the grocery store or visit a friend, I found every excuse I could to get on my electric bicycle. It has been the perfect instrument to replace my car, to keep my heart rate up a little and to keep my sanity during this time of Covid-19.

We would be happy to discuss this matter further and are available as a resource for anything needed by the agency. Thank you for your consideration of our comments.