Brad Barker - Comments

I am commenting on the proposed rule for rear passenger seat belt warning system. I have been in the school transportation industry for over 40 years. My standing today on occupant seat belts on school buses is that it is needed in all applications, 3 point belts only, however, monitoring the consistent use of belts as well as providing a fail proof system electronically will be daunting. What is a driver to do if passengers disconnect a belt during travel or the warning system is faulty indicating a disconnected belt when in fact it is connected? Are they to stop the bus? This would delay buses and overburden a driver which is already responsible for so much. Do you require assistants on each bus to monitor seat belt use? My experience with electrical warning systems makes me believe that maintenance of a monitoring system would be overwhelming for mechanics. There are no two systems remain functioning as specified. Although having 3 point belts in every seat is of great value I do not see how the monitored use as well as maintenance to keep them functioning is possible.