

December 27, 2019

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

**RE: Docket No. NHTSA-2019-0093
Advanced Notice of Proposed Rulemaking of Occupant Crash
Protection
Addendum to November 22, 2019, Written Comments from the
National School Transportation Association to the National Highway
Traffic Safety Administration**

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer an addendum to the written comments previously filed with the National Highway Traffic Safety Administration Notice on November 22, 2019, regarding the Agency's advanced notice of proposed rulemaking for occupant crash protection, as published on September 27, 2019, in Volume 84, Number 188 of the Federal Register.

NSTA is the leading resource for school bus transportation solutions and the voice for private contractors for over 55 years. NSTA was formed in 1964 as a membership organization for school bus contract-operators engaged primarily in transporting students to-and-from school and school-related activities. Our members range in size from small family businesses serving one school district, to large corporations operating tens of thousands of buses across multiple states committed to the safe, efficient and economical transportation of our nation's children and future leaders.

School bus transportation is the safest way to transport a child to and from school – even safer than walking, biking, or riding in a parent or fellow student's car. In fact, students are seventy times more likely to arrive at school safely when being driven by a school bus, than they would if they were riding in a car.¹ Each day, 26 million children are transported to-and-from school on an estimated 480,000 yellow school buses. Daily, the lives of children on a school bus are entrusted to certified school transportation professionals, who have received special training² and have the experience to ensure the safe transport of children to-and-from school and school related activities.

In our initial comments submitted to you on November 22, 2019, NSTA voiced several concerns about the workability, enforceability, and potential unintended consequences of this proposal.

Upon further consideration, NSTA requests that the NHTSA consider a full exemption for school buses, from this rulemaking - that requires rear seat belt alarm for passenger vehicles weighing 10,000 lbs. and less.

Ultimately, NSTA believes that this proposal likely will have little to no impact in creating a safer environment on a school bus. In fact, it is our belief that this initiative may in fact become a hindrance to the already stellar safety record of the school bus by removing school buses off the road due to the increased cost that this unfunded mandate represents. With that in mind, it is entirely possible that if this proposed rule forces buses off the road due to the added expense of operation, it will then have the effect of forcing students to take less safe modes of transportation to-and-from school and school-related activities.

NSTA appreciates the opportunity to offer additional comments on the NHTSA Notice, Docket No. NHTSA-2019-0093, and looks forward to working with you on this initiative, and other proposed rules. If further clarification is required, please do not hesitate to contact me at 703-684-3200 ext. 700, or by e-mail at cmacysyn@yellowbuses.org.

Sincerely,



Curt Macysyn
Executive Director
National School Transportation Association

¹ U.S. Department of Transportation, National Highway Traffic Safety Administration, "School Bus Safety," <https://www.nhtsa.gov/road-safety/school-bus-safety>; *see also*, American School Bus Council, "fact: The School Bus is the Safest Way to Travel to and from School," <http://schoolbusfacts.com/wp-content/uploads/2016/12/Safety-Benefits.pdf>

² See American School Bus Council "Safety Features of the School Bus," <http://schoolbusfacts.com/wp-content/uploads/2017/01/SafetyFeatures.pdf>