

Comment from Andrew Gardner

Gardian Angel, LLC hopes NHTSA reconsiders their previous position, and addresses the recommendation which includes evaluating the various technology. We at Gardian Angel, LLC hope to work with NHTSA pending completion of the revision to NHTSA's response, however we are disappointed that the initial response from the National Highway Transportation Safety Administration was to omit Section 2.5.3 Other Technologies to Prevent Illegal School Bus Passings and Increase Crossing Safety which was specifically reiterated to NHTSA in the Safety Recommendation H-20-011 from the NTSB's Final Highway Accident Report for the Rochester, Indiana vehicle collision with student pedestrians crossing high-speed roadway to board school bus."

There are so much more proven not to mention ethical options rather than the controversial school bus cameras as noted by the United States Department of Justice, issuing citations, and educational-based efforts. This technology is already here and like with the Gardian Angel is already allowed in more states than the cameras currently, aims to protect students before a tragedy occurs rather than recording the death of a child, and helps drivers stay more aware and possibly not getting a citation for illegally passing a school bus in the first place.

Deliberately blinding considerations is EXACTLY why the Rochester, Indiana school bus federal documents by the NTSB are in existence. Gardian Angel wants to ensure no family has to endure the "thoughts and "prayers" from state organizations which fail to act upon successfully-tested preventative pedestrian safety devices such as the Gardian Angel. Blatant inflexibility comes with an unfortunate price: children's lives. We have seen far too many reminders of how important failure to act can lead to unnecessary injuries and/or fatalities. No parent should ever have to bury their child(ren), let alone under such unfortunate circumstances set forth at the state (and now federal) level.

Since NHTSA has initially failed to satisfy the intent of H-20-011 and provide initial comment to 2.5.3, Gardian Angel, LLC aims to educate this agency (NHTSA) and the general public of what advanced technologies are included in section 2.5.3 which NHTSA does not fully address the recommendation as by the NTSB. These technologies can be found on page 56 of 70 under section 2.5.3 in HAR2002 Rochester, Indiana, Highway Accident Report. Shown here:
<https://www.nts.gov/investigations/AccidentReports/Reports/HAR2002.pdf>

School Bus Safety Technology includes:

The Gardian Angel School Bus Lighting System (aka supplemental lighting systems / enhanced school bus lighting)
Extended stop arm
Predictive stop arm

NTSB recommendation

NTSB's recommendation of H-20-011 - Evaluate the effectiveness of technologies designed to reduce the incidence of illegal school bus passings, and publish and disseminate the evaluation results. (H 20-11) (See section 2.5.3.)

source: https://www.nts.gov/investigations/_layouts/nts.recsearch/Recommendation.aspx?Rec=H-20-011

The NTSB stated in their final report, "Some of these technologies are intended to make students more visible, while others are designed to help motorists recognize a stopped school bus." Therefore, Gardian Angel, LLC requests that section 2.5.3 be reconsidered and included by NHTSA in their final efforts for classification by the NTSB. Gardian Angel, LLC urges the National Highway Traffic Safety Administration to reconsider its initial comment and work to implement the recommended rule-making before more lives are lost unnecessarily as proactive technology like the

Gardian Angel is already here helping thousands of students stay safer daily across the Nation.

Gardian Angel also referenced in:
Survival Factors Factual Report of Investigation
(page 17 - 19) 5.4. Safety Device Technology
<https://dms.nts.gov/public/63500-63999/63543/633450.pdf>

Conclusion:

If NHTSA is deliberately blinded to section 2.5.3 in the recommendation H-20-011 and omits include the new technology, someone else will, and already has (see H.R.2 Invest In America Act), but it sure makes NHTSA's mission statement of to save lives, prevent injuries, and reduce economic costs due to road traffic crashes, through education, research, safety standards, and enforcement more questionable when they ignore the light that helps others see that your children are safer because of the technology that already exists. As recommended initially by the NTSB please reconsider your initial position and include the various School Bus Safety Technology 2.5.3 as issued in the original recommendation to H-20-011

To learn about the Gardian Angel please visit www.GardianAngelLLC.com

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