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Christy Perry, Superintendent

December 2nd, 2020

U.S. Department of Transportation, National Highway Traffic Safety Administration
West Building, Ground Floor, Rm. W12-140
1200 New Jersey Ave. SE
Washington, DC 20590

SUBJECT: Comments and Suggestions
Federal Register/ Vol. 82, No. 212/ Monday, November 2nd, 2020
Docket No. NHTSA-2020-0093
RIN 2127-AL34

To Whom It May Concern:

Thank you for the opportunity for Salem-Keizer Public Schools Transportation Services to pose comments and suggestions related to Docket No. NHTSA-2020-0093. For background, Salem-Keizer Public Schools transports 14,843 students utilizing school buses, multi-functional school activity buses (MFSAB), and multi-purpose vehicles (MPV). We travel over 2.5 million miles annually and frequently use CRS while providing service to students with special needs, and students in pre-school.

1. IV. Installing CRSs with a Type 2 Belt Rather Than a Type 1 Belt: Page 69402

Salem-Keizer Public Schools Transportation Services are in support of amending the crash test standard to use a type 2 belt instead of a type 1 belt. Currently in Oregon, it is prohibited to purchase a school bus or MFSAB with type 1 seat belts; only type 2 is allowed. Additionally, our fleet of MPVs does not contain any type 1 belts.

Further, we is beginning to transition to a full fleet of school buses equipped with type 2 seat belts. While this will take time, updating the crash test standards will ensure that CRSs used in school buses have been tested using systems available to use in both school buses and MPVs.

2. VIII. Communicating With Today's Parents: Page 69424.

Salem-Keizer Public Schools Transportation Services is in support of allowing additional electronic/digital options for car seat registration with manufacturers. As a fleet with a large need for CRSs, it is very beneficial for us to be able to submit registration electronically, as it would be for most organizations that provide CRSs for children in their care.

Further, we support the ability to access the electronic registration though a means other than a web address such as a QR code. The ability to use a scannable code on a label could greatly increase the registration of CRSs, especially in the case of a secondhand child seat or a situation with lost documentation.

We ask that NHTSA consider an electronic receipt requirement or recommendation to electronic registrations. This would provide the CRS owner with documentation and confirmation that the CRS has been registered for recall notification. Further, the receipt should indicate the date at which the CRS owner will no longer be notified of a potential recall under 49 CFR 588 “Child restraint systems recordkeeping requirements”.

3. **VIII. Communicating With Today’s Parents: Page 69425**

Salem-Keizer Public Schools Transportation Services sees no barriers from the fleet perspective of removing the restrictions on size, font, color, layout, and attachment method of the information card portion.

4. **VIII. Communicating With Today’s Parents: Page 69426**

Salem-Keizer Public Schools Transportation Services supports the proposed changes to the CRS label requirements.

Requiring the label to indicate the proper weight in each mode of a CRS with more than one mode should increase safety and compliance for use in both personal and fleet settings.

We also support the change to the weight standards for CRSs; this will ensure that more children are transported in the safest way possible. Further, this will provide our drivers with readily available information on any CRS that we use to transport students.

5. **IX. Streamlining NHTSA’s Use of ATDs in Compliance Tests To Reflect CRS Use Today: Page 69429**

Salem-Keizer Public Schools Transportation Services is in support of the proposed ATD use in child restraint systems testing as outlined in the NPRM, as it makes sense to test CRS to the same standards as indicated on the label.

6. **X. School Bus CRS Docket No. NHTSA-2020-0093: Page 69436**

Salem-Keizer Public Schools Transportation Services is in support of allowing additional, rigid, school bus only CRSs. We transport a wide variety of students on our school buses, so it is beneficial to have as many options as possible.

However, we would advocate for a change to the word “harness”, as this promotes a very negative connotation to parents when we discuss putting their children in one. Our district typically refers to them as a “safety vest”, although that term may or may not be appropriate for all types of “harnesses”.

In general, we also advocate changing the overall term from “Child Restraint System” to “Child Safety Restraint System” or “Child Securement System” for the same reasons.

It is unclear in this NPRM if these changes are enough to allow infant school bus only CRSs.

Many infant CRS do not fit appropriately in a school bus due to the required seat design and spacing in FMVSS 222. We understand that an infant seat designed for a school bus may not work in other vehicles. As a result of this discrepancy, we ask that NHTSA to consider potential remedies to increase infant safety when they need to be transported in a school bus.

Thank you for your consideration, and this opportunity to give our feedback.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T.J. Crockett', with a long horizontal flourish extending to the right.

T.J. Crockett
Director, Transportation Services