

February 2, 2021

RE: Department of Transportation National Highway Traffic Safety Administration [Docket No. NHTSA–2020–0018] Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Reducing the Illegal Passing of School Buses

BusPatrol, a safety technology company that works to reduce school bus stop-arm violations at no cost to taxpayers, schools or municipalities, supports the methodologies being used by the National Highway Traffic Safety Administration to survey drivers understanding of current bus passing laws and especially the proposed survey assessing driver knowledge prior to and after the implementation of a high visibility enforcement (HVE) program.

Correcting the community's driving habits supports a culture of mutual responsibility. Current laws governing school bus stop-arms are not publicized as frequently as other moving violations that drivers adhere to all year long, and a lack of municipal resources for proper enforcement of stop-arm violations contributes to driver perceptions that their actions are only a problem if caught by law enforcement.

The implementation of stop-arm technology provides a critical opportunity to educate drivers on existing laws motorists need to learn to pay attention to school buses and proceed with care and caution in their presence. Only when people are consistently held accountable for their careless behavior, in every neighborhood, will the culture change.

Last year BusPatrol implemented a 47-school day pilot program for the Allentown School District, equipping two school buses with stop arm cameras and GPS to collect data on the ongoing problem of stop-arm violations in Pennsylvania.

The results of the pilot identified 205 total violations in 21 unique locations across Allentown over 47 school days. The two participating buses captured an average of 2.18 violations per bus per day.

These results highlight the need for driving culture to change in our country and the state of Pennsylvania consequently adopted a stop-arm camera enforcement policy.

Overall, in municipalities where BusPatrol operates, 98% of the people who are issued a ticket for a stop-arm infraction, don't commit a second violation. Stop-arm camera enforcement programs are also currently changing driving behavior in school districts across Maryland, Virginia and Georgia, New York, Pennsylvania, Washington State and Connecticut.

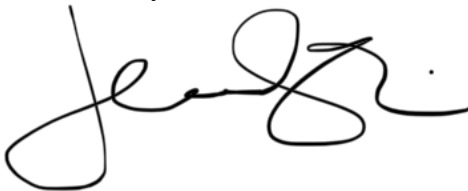
In addition, when launching stop-arm enforcement programs, school buses are outfitted with advanced technology that provides added safety tools for school officials to better manage their fleets. Beyond the enforcement benefits, school districts also gain access to cloud-enabled school buses, routing data, and GPS and telemetry solutions. Data dashboards facilitate data-driven decision making to improve operational efficiency, security and safety.

For all these reasons, BusPatrol supports the purpose of The National Highway Traffic Safety Administration's surveys and methodologies and believes that the outcomes will not only shed light on a national bus safety problem but also inform the Administration's guidance on implementing effective nationwide solutions and recommendations that will improve safety and save lives in all states.

Every single child has the right to be safe, and it's our responsibility as a community to take proactive measures to foster a safer environment for students. Motorists need to learn to pay attention to school buses, and proceed with care and caution in their presence. Only when people are consistently held accountable for their careless behavior, in every neighborhood, will the culture change. Equipping every school bus with world-class safety technology is the first step towards a safer future.

We look forward to the results of these critical surveys.

Sincerely,



Jean Souliere

BusPatrol, Founder and Chief Executive Officer