



School Bus Safety

Independent Advocates For Children Transportation Safety

**U.S. Department of Transportation
Office of Assistant Secretary for Administration
1200 New Jersey Ave, SE
Room W80-318
Washington, DC 20590**

Dear Secretary,

School Bus Safety Advocates are dedicated to our children's transportation safety. We advocate for driver training and bring attention to school bus manufacturing issues.

Our main goal is to bring attention to the critical need to have seatbelts installed on all school buses in every state in our nation with Federal Regulatory Control.

Enclosed please find information for our mission to help.

Thank you in advance for your time and support,
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FEDERAL REGISTER Document Number: 2021-27538

Summary: NHTSA is issuing this final rule to establish Federal Motor Vehicle Safety Standard (FMVSS) No. 227, “Bus rollover structural integrity,” to enhance the rollover structural integrity of over-the-road buses (motorcoaches), and other buses with a gross vehicle weight rating (GVWR) greater than **11,793 4,535** kilograms (kg) (~~26,000~~ **10,000** pounds (lb)). This final rule, issued pursuant to the Moving Ahead for Progress in the 21st Century Act (MAP-21), requires the buses to provide a “survival space” in a rollover test to protect occupants from possible collapse of the bus structure around them. In addition, to reduce the likelihood of ejection, this final rule prohibits emergency exits from opening in the rollover test. This final rule ensures that bus roofs and side wall panels **and floor strength** will resist deformation and intrusion into the occupant space in rollover crashes, and reduces the risk of emergency exits becoming ejection portals in a crash.

Agency: National Highway Traffic Safety Administration

Parent Agency: Department Of Transportation

Date Published: December 29, 2021

Docket Number: NHTSA-2021-0088

Action:

Final Rule

Action Reply:

Petition for Reconsideration

This change to GVWR must be implement into this Final Rule to improve rollover structural integrity of all buses on our roads.

Since roof and wall strength is also applicable to floor strength for controlled survival space, improved floor strength should also be added. This will help to reduce deformation and intrusion and the risk of emergency exits becoming ejection portals in a crash.

These improvements to bus safety should take full advantage of this Final Rule in order to require structural improvements that will also allow for adding improved seating systems mounted to the improved strength floor for adding seatbelt assemblies.

Buses, especially school buses, should no longer be the only exception to our nation’s seatbelt laws.