

September 18, 2014

Docket Management Facility (M-30)  
U.S. Department of Transportation  
West Building Ground Floor  
Room W12-140  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590-0001

To Whom it May Concern:

The National School Transportation Association (NSTA) is pleased to offer written comments for the Federal Motor Carrier Safety Administration's (FMCSA) Consideration of Negotiated Rulemaking Process for Minimum Training Requirements for Entry-Level Commercial Drivers' License Applicants; as published in Volume 79 of the *Federal Register* on August 6, 2014.

The National School Transportation Association (NSTA) is the membership organization for school bus companies engaged primarily in transporting students to and from school and school-related activities under contract to public school districts. Our members offer a range of services to our school district partners, from full turn-key service to management operations and specialized transportation. NSTA members range from small family businesses serving one district to large corporations operating thousands of buses across many states, all committed to the safe, efficient, and economical transportation of America's children.

NSTA firmly believes in and supports the Negotiated Rulemaking process and we are pleased to see FMCSA considering this approach for this complex issue. We believe that by bringing those that would be effected by this proposal together to discuss and understand each other's views, a compromise can be reached that would benefit all and ensure the safety of all commercial motor vehicle drivers and their passengers.

NSTA was fortunate to be included on the 2008 Charter Bus Negotiated Rulemaking Committee and found the process very beneficial. That was a contentious issue as well, with many varying viewpoints, but through discussion we each gained a better understanding of the nuances of the issue and how it affected the various components of the traveling industry. Ultimately, the committee reached a compromise solution that was accepted and remains in place today. We believe that by being part of that Negotiated Rulemaking Committee, we were able to speak for the school transportation industry to ensure that the industry was understood and ultimately treated fairly in the compromise. We believe we could serve that same role with the Entry-Level Driver Training Negotiated Rulemaking.

NSTA would like to be considered as a member of this Negotiated Rulemaking Committee and requests an interview by the convener as part of that process. We will also follow the *Federal Register* notices and submit a formal request should that be necessary. While every member company conducts their own training and has their own best practices, NSTA speaks on behalf of all our members to ensure that

school bus driver training, which is different from other commercial motor vehicle driver training, is understood and fairly included in the ultimate solution.

There are significant differences between entry-level driver training for the trucking industry and school bus industry. This starts with the fact that most school districts and school bus contractors train their own drivers rather than send them to a driving school. In addition, school bus transportation is heavily regulated by state requirements, which in many states also address the technical aspects of driver training. There are also significant differences regarding how our industry approaches the safety aspects of our service delivery, which is embedded in our driver training practices. We believe these practices, state regulations and our industry's commitment to safety have helped our industry to achieve our outstanding safety record. School transportation is the safest form of transportation in the country and safety is at the heart of everything we do as an industry. The training of our drivers is thus very important to us.

We again commend FMCSA on considering the Negotiated Rulemaking process and we look forward to assisting in the efforts to reach a compromise solution on this issue that benefits all.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ronna Sable Weber', is displayed on a light gray rectangular background.

Ronna Sable Weber  
Executive Director