



National School Transportation Association

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July 6, 2015

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

Attention: Written Comments for the Notice of Proposed Rulemaking on Qualifications of Drivers;
Diabetes Standard (FMCSA-2005-23151)

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer written comments for the Federal Motor Carrier Safety Administration's (FMCSA) Notice of Proposed Rulemaking on Qualifications of Drivers; Diabetes Standard as published in Volume 80 of the *Federal Register* on May 4, 2015.

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 commends the Agency for issuing this proposal to change the way in which commercial motor vehicle drivers with manageable diabetes are approved to drive. Securing approval for a commercial motor vehicle driver under the current system is cumbersome and time-consuming. The proposed system allows for a streamlining of the process and a better use of resources both for FMCSA as well as for the driver.

NSTA and its members care deeply about safety of the transportation of schoolchildren. The nation's 500,000 yellow school buses are the safest mode of transportation over all others. Students are 58 times more likely to arrive at school alive if they ride the school bus than if they drive themselves or ride with friends. Students are even safer riding in a school bus - 23 times safer actually - being driven by a parent. The safety of every driver is critical to ensuring that our buses are as safe as they can be. As stated in the proposal and quoted from the American Diabetes Association, "Most people with diabetes safely operate motor vehicles without creating any meaningful risk of injury to themselves or others." NSTA agrees with this statement and supports the proposal offered by FMCSA as it applies to commercial motor vehicle operators driving school buses.

We appreciate the opportunity to offer our comments on this Notice for Proposed Rulemaking and look forward to continuing to work with the Federal Motor Carrier Safety Administration on this issue. We take

safety very seriously and are very proud of the work we do each and every day to transport children to school safely as well as the charter work we operate.

Thank you for the opportunity to provide these written comments. If you require further clarification, please do not hesitate to contact me at (703) 684-3200.

Sincerely,

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

Ronna Sable Weber
Executive Director