



National School Transportation Association

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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 Request for Public Comment on the Proposal for Future Enhancements to the Safety Measurement System (SMS) (FMCSA-2015-0149)

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) Request for Public Comment on the Proposal for Future Enhancements to the Safety Measurement System (SMS) as published in Volume 80 of the *Federal Register* on June 29, 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 is pleased to see that FMCSA continues to evaluate the SMS system, but is disappointed in the enhancements the Agency has proposed to make at this time. The proposed enhancements focus on limited areas within the SMS, but do not serve the greater good, which could be enhanced with broader reform. As an example, in the January 14, 2014 comments NSTA submitted to FMCSA on its then proposed enhancements, NSTA offered:

"Within the peer groupings, however, we would like to suggest that like entities are grouped. As it currently exists, carriers are grouped by size, which is understandable, but there is no consideration for whether they are a freight carrier or a passenger carrier – both of which have significantly different operating environments and characteristics as well as safety concerns. We believe that by grouping freight carriers truly with their peers of other freight carriers and passenger carriers truly with their peers of other passenger carriers, a more accurate depiction of safety performance rankings will be realized."

NSTA still believes this improvement to the SMS would be a significant improvement and it is one we hope the Agency will continue to consider.

We strongly encourage FMCSA to address the crash preventability issue by removing non-preventable crashes from the BASIC based upon police reports. In addition, crashes should be normalized by million miles driven rather than the utilization factor currently employed.

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.

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 "Ronna Sable Weber", is written over a light gray rectangular background.

Ronna Sable Weber  
Executive Director