



October 1, 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 Propose Rulemaking on Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles, Phase 2 (NHTSA-2014-0132)

AND

Air and Radiation Docket and Information Center  
Environmental Protection Agency  
Mail Code: 28221T  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Attention: Written Comments for the Notice of Propose Rulemaking on Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles, Phase 2 (EPA-HQ-OAR-2014-0827)

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer written comments for the joint National Highway Traffic Safety Administration (NHTSA) and Environmental Protection Agency (EPA) Notice of Proposed Rulemaking on Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles, Phase 2 as published in Volume 80 of the *Federal Register* on July 13, 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 an array 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.

We understand that the proposal aims to establish a comprehensive Phase 2 Heavy-Duty National Program to reduce greenhouse gas emissions and fuel consumption for new on-road heavy-duty vehicles. In addition, we note that this program would phase in over the long-term, beginning in 2018 model year and culminating in standards for model year 2027. Our comments are specific to school buses, which fall under vocational vehicles, and do not speak to any of the other vehicles addressed in this proposal.

NSTA is proud to be part of the largest and safest transportation system in the country. The nation's fleet of 480,000 yellow school buses provides safe, fuel-efficient and environmentally-friendly transportation to school children across the United States.

NSTA members welcome efforts to improve fuel economy for school buses, but efforts to improve fuel economy should not come at the expense of reducing safety for school children riding the school bus. There can be no higher priority than protecting our precious cargo. While catastrophic school bus crashes have occurred, they are rare events. Most school bus crashes are minor, and in most crashes involving passenger cars and light trucks, the school bus has the advantage of its larger size and weight. That larger size and weight helps protect occupants, but may also exist at the expense of fuel economy.

Yellow school buses are designed to protect students with special safety features not available on any other vehicle. These features include their recognizable color and size, height, reinforced sides, protective passenger seating, crash protected fuel systems, flashing red lights, cross view mirrors and crossing and stop sign arms to ensure children are protected and secure on and off the bus. School bus drivers also receive specialized training in student behavior management, loading and unloading security emergency medical procedures. Drivers receive driving record checks, criminal background checks and pre-employment and random drug and alcohol testing.

The typical school bus is not only the safest vehicle on the road, but it also achieves significant fuel economy and emission reduction benefits. New diesel engine standards make today's buses 98% cleaner than buses manufactured two decades ago. Additionally, thousands of older buses have been modified with high-tech filters and catalysts to reduce emissions. In addition, school bus transportation eases the traffic congestion surrounding schools each morning and afternoon by keeping millions of cars off roads. Encouraging school bus use can achieve significant fuel economy and greenhouse gas reduction benefits.

We are concerned, however, with the extremely aggressive timeline suggested by NHTSA and EPA in this proposal. We are aware that our manufacturer partners have significant concerns with meeting the requirements outlined in the proposal. We urge NHTSA and EPA to continue the dialogue on these requirements to ensure that the manufacturing industry can meet the requirements and not disrupt production in the process. To be effective, efficient and safe, school transportation is reliant upon the availability of school buses. Any requirement which could potentially affect the availability of school buses could affect a provider's ability to secure

enough vehicles to effectively manage their fleet. As currently proposed, we fear a significant effect on our ability to manage fleets and secure additional vehicles when needed.

In closing, we appreciate the opportunity to offer our comments on this Notice of Proposed Rulemaking and look forward to continuing to work with the both the National Highway Traffic Safety Administration and the Environmental Protection Agency on this issue.

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