



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 in Response to the Announcement of a Public Meeting on Guidelines for the State Deployment and Operation of Automated Vehicle Safety Technology (NHTSA-2016-0026)

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer written comments for the National Highway Traffic Safety Administration's (NHTSA) Announcement of a Public Meeting on Guidelines for the Safe Deployment and Operation of Automated Vehicle Safety Technologies as published in Volume 81 of the *Federal Register* on March 18, 2016.

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.

The incorporation of automated vehicles into our nation's transportation system is of great interest and great concern to the school transportation industry. While we welcome the consideration of the growth of automated technologies and all that such advancements could bring to the transportation sector, we are most concerned with the safety of the nation's school children and the point at which automated vehicles traveling on the nation's roads interact with school buses carrying the nation's children.

Approximately 480,000 yellow school buses carry almost 26 million children to and from school in urban, suburban and rural areas of the country every day. When school buses are stopped to load and unload passengers the other vehicles traveling around those school buses are required to stop. School buses are obviously not the only commercial vehicles traveling through areas where school children live, but they are the only vehicles requiring all drivers to stop when they are stopped.

Safety is the top priority of the school transportation industry and it is through the lens of safety that we are compelled to engage on this issue. Before automated vehicles should be allowed to enter into the nation's

mainstreamed transportation it is of critical importance to the school transportation industry, the nation's school children and families across American that we be assured that automated vehicles have the ability to differentiate between different types of vehicles and the requirements of those vehicles. We implore NHTSA to carefully consider all safety dynamics of the traveling public and the real world repercussions of such advancements such as the admission of autonomous vehicles on the nation's roads. America's school children deserve no less.

The safety record of the iconic yellow school bus exists today because of the importance this industry has placed on safety. Travel by school bus is the safest form of transportation available and the school transportation industry works hard each and every day to ensure that we are not only operating in a safe environment, but that we are promoting a culture of safety in everything we do. We are one of the most heavily regulated industries and we know those regulations exist for the safety of the students we transport. It is because of our commitment to safety that encourage NHTSA to proceed on this issue very carefully and ensure that any autonomous vehicle traveling the nation's roads is capable of distinguishing a school bus from any other vehicle and responds accordingly.

In closing, we appreciate the opportunity to offer our comments on this issue and look forward to continuing to work with the National Highway Traffic 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