



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 to the National Highway Traffic Safety Administration's Request for Comment on the Federal Automated Vehicles Policy (NHTSA-2016-0090)

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) request for comments to the Federal Automated Vehicles Policy as published in Volume 81 of the *Federal Register* on September 23, 2016.

The National School Transportation Association (NSTA), which was formed in 1964, 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.

School bus carriers, public and private, operate the largest mass transportation fleet in the country. Each day, 480,000 yellow school buses travel the nation's roads carrying 26 million children to and from school. Compare that to transit, with 140,000 total vehicles, 96,000 of which are buses; to the motor coach industry with 35,000 buses; to commercial airlines with 7,400 airplanes; and to rail, with 1,200 passenger cars. In fact, the nation's school bus fleet is 2.5 times the size of all other

forms of mass transportation combined. To ensure the highest possible degree of safety, the iconic yellow school bus has a unique design but also unique operating characteristics, which are different from all other vehicles sharing our nation's roadways. In fact, according to the Department of Transportation's own statistics, school bus transportation is the safest mode of transportation over all other modes. Our industry takes this daily safety responsibility very seriously.

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 different requirements of each of those vehicles. To that end we are most concerned that any autonomous vehicle technology be designed with the ability to recognize all school transportation vehicles, many of which are the traditional yellow school bus, but some of which are regular vehicles, which serve in a school transportation capacity. Having the ability to recognize school transportation vehicles, regardless of their appearance or color, and their unique operating environment is critical to the safety of all children and the traveling public. We implore NHTSA to carefully consider all safety dynamics of the traveling public and the real world repercussions of the admission of autonomous vehicles on the nation's roads. America's school children deserve no less.

In addition, we are concerned about the mixing of technology in busy urban areas, suburban areas where there are many children and in rural areas where school transportation, which typically involves highway travel, is often a child's only access to education. When school buses are stopped the other vehicles traveling around those school buses are required to stop to ensure the safety of those children that are boarding or disembarking the school bus. School children are often required to cross busy roadways, and we rely on other motorists to recognize school vehicles and stop to allow that safe crossing. 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. Regardless of the color or design of the vehicle the industry must be assured that automated vehicles are required to abide by this requirement to ensure the safety of the nation's school children.

In recent years there has been a significant increase in the number of vehicles that pass stopped school buses. This is a great safety problem which needlessly endangers the lives of many school children each year. The National Association of State Directors of Pupil Transportation Services (NASDPTS) has led the school transportation industry in gathering data on this important issue. Every year NASDPTS asks the state directors of school transportation to choose one day to track motorists passing stopped school buses in their states and report their findings to the Association. In their 2016 survey, NASDPTS found that in 33 states and the District of Columbia, over 96,000 school bus drivers reported that 74,421 vehicles passed their buses illegally on a single day. Throughout a 180-day school year, these sample results alone points to over 13 million violations by private motorists. These numbers show the seriousness of the problem of motorists passing stopped school buses and the danger this poses to America's school children. It is our hope that

the advancement of autonomous vehicles will help to reduce this problem rather than exacerbate it. 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. It is because of our commitment to safety that we encourage NHTSA to proceed on this issue very thoughtfully and very carefully to ensure that any and all autonomous vehicles traveling the nation's roads are capable of distinguishing a school bus from any other vehicle and responds accordingly.

It is also because of this commitment to safety that we encourage NHTSA to ensure that all relevant governmental agencies, including at the very least the Federal Motor Carrier Safety Administration and the Department of Homeland Security are included in this discussion. Given the Federal Motor Carrier Safety Administration's regulation of commercial motor vehicle drivers, to include such relevant issues as hours of service and safety fitness determination, and the Department of Homeland Security's concern for the security of the traveling public their inclusion is necessary to ensure a seamless introduction of such technologies into our nation's roadways.

We appreciate the opportunity to offer these 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. 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", with a long horizontal flourish extending to the right.

Ronna Sable Weber
Executive Director