



National School Transportation Association

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January 3, 2017

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 Federal Motor Carrier Safety Administration's Notice of Proposed Rulemaking on the Process for Department of Veterans Affairs (VA) Physicians to be added to the National Registry of Certified Medical Examiners (FMCSA-2016-0333)

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 the Process for Department of Veterans Affairs (VA) Physicians to be added to the National Registry of Certified Medical Examiners as published in Volume 81 of the *Federal Register* on December 1, 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.

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.

Although the numbers and the reasons behind those numbers fluctuate, many areas of the country are experiencing a reduction in the availability of those seeking to become school bus drivers. In order to balance this and ensure adequate drivers, school bus carriers try to attract personnel through various methods in hopes of finding the right balance within a community. With safety of

the nation's schoolchildren as the top priority, any concerted and safe effort to expand the availability of drivers and or of the certified medical examiners to screen those drivers is welcome news to the school transportation industry and we applaud FMCSA for initiating this proposal to include Department of Veterans Affairs physicians in the Certified Medical Registry.

We appreciate the opportunity to offer these comments on this issue 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. 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". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Ronna Sable Weber
Executive Director