



National School Transportation Association

122 South Royal Street
Alexandria, VA 22314
703-684-3200
info@yellowbuses.org

February 6, 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 National Highway Traffic Safety Administration's Request for Public Comment on the Proposed Collection of Information on the Education of the Proper Use of Safety Belts on School Buses (NHTSA-2016-0121)

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 public comment on the proposed collection of information on the education of the proper use of safety belts on school buses as published in Volume 81 of the *Federal Register* on December 7, 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.

We note that the proposal to collect information on the proper use of safety belts on school buses includes NHTSA working with NSTA and others to identify school districts that either have implemented or are looking to implement seat belts on school buses. As we currently do not track such information, we would intend to ask our members to identify such school districts and then convey those districts to NHTSA when called upon.

As to the survey in general, we note that the decision of whether or not to equip school buses with seat belts is a complex issue necessitating the consideration of a multitude of factors. We are pleased that NHTSA's approach is to examine the local decision making process in the study

as we believe this will confirm our view that there is simply no “one size fits all” approach to the decision of whether to put seat belts on school buses.

We note that while your proposal to collect the study information does not include surveying districts that have previously debated placing seat belts on school buses and decided against them, we encourage you to consider such districts in your study nonetheless. The reality is that financial resources are very tight for many school districts and in the end, when weighing all factors some districts decide against belts because the additional costs will require a reduction in school bus service and force children into less safe modes of transportation. The agency’s own statistics show that a child is always safer in a yellow school bus, with or without belts, than walking, biking, being driven by parents or driving themselves to school. Understanding these decisions and the factors that contribute to them will be beneficial to the agency in the overall review of this issue.

Another element worthy of study is the usage of seat belts. NSTA recommends the study examine usage rates in school districts that have mandated seat belts and how districts address the usage issue. If a school district implements seat belts on school buses, but does not also embrace a usage policy, it becomes very difficult ensure the seat belts are worn, let alone worn properly. Most school buses do not have attendants on board and school bus drivers must focus on safe loading and unloading of children and driving safely.

We are pleased to see the Agency looking into behavior with respect to seat belts. Operationally and anecdotally our members report an overall improvement in behavior on school buses with seat belts versus those without. However, they also report an increase in other complications such as lap belts being entangled in backpacks and coats, children using the metal portions of the seat belts to hit other children or themselves and vandalism of the belts requiring additional costs of frequent replacement. We hope your study will focus not only on the impact of belts for the school bus driver but also the effects of belts on the children on the bus as well.

In addition, we encourage NHTSA to query drivers as to any concerns they may have with seat belts, including whether or not they serve as an impediment during evacuation, especially during thermal or water events. NSTA has repeatedly raised this as a concern but has met resistance within NHTSA on this issue. While NSTA overall encourages studying of this issue, anecdotal concerns raised by drivers may aid in persuading the Agency to give this very real concern the careful attention it deserves. As further evidence of this concern and many others expressed in this letter we encourage NHTSA to review the recent report of the Louisiana Task Force on School Transportation presented to the Louisiana House and Senate Education Committees.

We commend NHTSA for looking at this issue to gather data to educate those in the school transportation industry. We know school buses are the safest form of transportation available, but ensuring that continued safety is always our utmost concern.

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". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ronna Sable Weber
Executive Director