



National School Transportation Association

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March 23, 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 Office of the Secretary of Transportation's Notice of Proposed Rulemaking on Procedures for Transportation Workplace Drug and Alcohol Testing Programs: Addition of Certain Schedule II Drugs to the Department of Transportation's Drug-Testing Panel and Certain Minor Amendments (OST-2016-0189)

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer written comments for the Office of the Secretary of Transportation's Notice of Proposed Rulemaking on Procedures for Transportation Workplace Drug and Alcohol Testing Programs: Addition of Certain Schedule II Drugs to the Department of Transportation's Drug-Testing Panel and Certain Minor Amendments as published in Volume 82 of the *Federal Register* on January 23, 2017.

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 appreciate the efforts of and commend the Office of the Secretary for taking the initiative to address this overlooked issue. Ensuring the continued safety of school transportation professionals across the country is always our utmost concern and closing this unintended loophole will do just that. Our members strive for and believe in a zero tolerance workplace. School bus drivers are required to submit to pre-employment, post-accident, reasonable suspicion and random testing. The substances covered in this Notice of Proposed Rulemaking should have always been included in the list of substances tested and we are encouraged that this gap might soon be resolved.

We appreciate the opportunity to offer these comments on this issue and look forward to continuing to work with the Office of the Secretary 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 'R. Sable Weber', with a long horizontal flourish extending to the right.

Ronna Sable Weber  
Executive Director