



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 Notice of Proposed Rulemaking on the Federal Motor Vehicle Safety Standard on Vehicle-to-Vehicle Communications (NHTSA-2016-0126)

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) Notice of Proposed Rulemaking (NPRM) for the creation of a new Federal Motor Vehicle Safety Standard (FMVSS No. 150) to mandate vehicle-to-vehicle communications for new light vehicles as published in Volume 82 of the *Federal Register* on January 12, 2017.

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.

As we noted to the agency on November 22, 2016 in our written comments on NHTSA's Federal Automated Vehicles Policy (NHTSA-2016-0090), 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.

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 America 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, serving in a school transportation capacity. In addition, we are concerned that the dynamic operating nature of the school bus may not be fully recognized. For example, lights are activated and stop arms are deployed on school buses at the time of a stop, but neither technology is activated at all times. Additionally, when not activated, school buses travel with the stop sign retracted, but the sign remains visible on the side of the vehicle. Having the ability to recognize school transportation vehicles, regardless of their appearance or color, and their unique and dynamic operating environment is critical to the safety of all children. We implore NHTSA to carefully consider all of the various safety dynamics 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. Stopped traffic ensures the safety of the children boarding and disembarking from the school bus. School children are often required to cross busy roadways and school bus drivers then 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 point 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 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 respond accordingly.

Our concern for safety is at the heart of everything we do as an industry. It is because of this focus that we believe the addition of this requirement to light passenger cars will be of benefit to the traveling public and could serve to help prevent crashes with school buses as well as with other vehicles. Not only would this advancement help to address the safety of school children as they board and depart the school bus, but it could also help to prevent distracted drivers and others from crashing into stopped school buses, another great safety concern.

In addition, the school transportation industry has long discussed the benefits vehicle-to-vehicle technology could bring to the traveling public and the great safety opportunity this technology represents. While we recognize that this NPRM addresses passenger cars only, we encourage NHTSA to continue the integration of this technology into commercial motor vehicles as well. If developed properly and integrated on all vehicles, this technology could allow school buses to signal both the infrastructure and approaching vehicles that the school bus is in the process of loading or unloading on the roadway ahead, which could then trigger a warning to the driver of the passenger car approaching the school bus to slow down and stop, or stop the passenger car entirely if necessary. We urge NHTSA to factor such significant safety benefits into its planning processes and to move swiftly to implement this technology on all vehicles on the road as quickly as possible.

We appreciate the opportunity to offer these comments on this issue and look forward to continuing to work with the NHTSA 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,



Ronna Sable Weber  
Executive Director