



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 Federal Motor Carrier Safety Administration's Public Listening Session Notice on Highly Automated Commercial Vehicles (FMCSA-2017-0114)

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) Public Listening Session Notice on Highly Automated Commercial Vehicles as published in Volume 82 of the *Federal Register* on April 17, 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 National Highway Traffic Safety Administration (NHTSA) on November 22, 2016 in our written comments on the agency's Federal Automated Vehicles Policy (NHTSA-2016-0090) and again in our written comments on the agency's Notice of Proposed Rulemaking on the Federal Motor Vehicle Safety Standard on Vehicle-to-Vehicle Communications (NHTSA-2016-0126) on April 12, 2017, 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. In addition, 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.

While this notice requests comment specifically on the design, development, testing and deployment of highly automated commercial vehicles, we are focused solely on its deployment. We know that great safety benefits can be achieved in the passenger vehicle market and look forward to the realization of these advancements especially in preventing passenger cars from running into school buses and motorists illegally passing stopped school buses, both of which put the lives of school children across the country at risk every day.

As for the deployment of highly automated technology in the passenger market, we continue to debate this issue within our industry. On the one hand, we recognize that the technology has the potential to save lives, and create greater efficiencies within our industry. On the other hand, the lives of children across the country are entrusted to school transportation professionals every day, and it is in their training, experience and dedication to safety that we are able to achieve our distinguished safety record. Furthermore, in order to ensure the safety and security of the nation's most precious cargo – our children - we know that at least one adult, and sometimes two depending upon the route and the state, must be on every school bus every day. We believe the deployment of this technology within the passenger market may one day come, but believe it should be first within those industry servicing adults prior to any integration with children.

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