



October 10, 2012

Document Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.W.  
West Building, Ground Floor  
Room W-12-140  
Washington, DC 20590-0001

Attention: Written Comments for Meeting of the Compliance, Safety,  
Accountability (CSA) Subcommittee of the Motor Carrier Safety Advisory  
Committee (MCSAC)  
DOT Docket No: FMCSA-2006-26367

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) Meeting of the Compliance, Safety, Accountability (CSA) Subcommittee of the Motor Carrier Safety Advisory Committee (MCSAC) as published in Volume 77 of the *Federal Register* on October 3, 2012.

The National School Transportation Association (NSTA) 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 a range 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.

NSTA has two primary concerns with the current CSA program. While we agree with the intent of the program, we believe the program falls short of its intent and we encourage FMCSA to consider making alterations to the program which could improve its performance significantly.

First, the peer groups should be re-evaluated to separate freight and passenger carriers. We respectfully submit that creating separate categories for passenger

(motorcoaches, transit buses and school buses) and freight vehicles would be of benefit to all vehicle types.

Second, the use of crash data is a concern. We suggest the use of crash rate per million miles as a better indicator of safety performance over the current utilization factor. In addition, "contributing factor" data from police reports should be incorporated to exempt non-preventable crashes.

Collectively, we believe that these two adjustments will provide a more actual portrayal of the safety performance of passenger carrying vehicles.

Thank you for the opportunity to provide these written comments. If you require further clarification, please 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 the first name being the most prominent.

Ronna Sable Weber  
Executive Director  
National School Transportation Association