

October 26, 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 the State Graduated Driver Licensing
Incentive Grant
DOT Docket No: FMCSA-2012-0137

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) State Graduated Drivers Licensing Incentive Grant as published in Volume 77 of the *Federal Register* on October 5, 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.

According to the Centers for Disease Control and Prevention, in 2010, about 2,700 teens in the United States, ages 16-19, were killed and almost 282,000 were treated and released from emergency departments for injuries suffered in motor vehicle crashes. People ages 15-24 represent only 14% of the population, but they account for 30% of the total costs of motor vehicle injuries. As automobile accidents are the number one killer of teens, any effective effort to reduce these crash rates must be implemented.

In addition, the presence of teen passengers increases crash risk, and that risk only increases as the number of teen passengers increases. Nearly two out of

three teen crash deaths that involve 16-year-old drivers happen when a new driver has one or more teen passenger. In order for this program to be as effective as it needs to be, NSTA fully supports the specific inclusion of this element as well.

Moreover, the research shows that graduated licensing programs work. The most comprehensive programs have been associated with a 38%-40% reduction in crashes with injuries and fatalities among 16 year old drivers.

Without question, NSTA is committed to safety and fully supports the State Graduated Driver Licensing Incentive Grant Program. While children traveling to school are eight times safer traveling by school bus than in the family car, teens are 49 times safer if they ride the school bus rather than driving themselves or riding with teenaged friends.

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 a long horizontal stroke at the end.

Ronna Sable Weber
Executive Director
National School Transportation Association