



August 21, 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: Notice of Proposed Rulemaking to Establish a New Federal
Motor Carrier Vehicle Safety Standard: Electronic Stability Control
Systems for Heavy Vehicles
DOT Docket No: NHTSA-2012-0064

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer comments to the National Highway Traffic Safety Administration's (NHTSA) Notice of Proposed Rulemaking to establish Federal Motor Vehicle Safety Standards (FMVSS) No. 136, Electronic Stability Control Systems for Heavy Vehicles, as published in Volume 77 of the *Federal Register* on May 23, 2012. The proposed rule would establish a new safety standard requiring electronic stability control systems on truck tractors and certain buses with a gross vehicle weight rating of over 26,000 pounds.

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.

As expressed within the NPRM, the proposal does not currently apply to school buses and NSTA would agree with this approach. As noted, vehicles such as school buses "should be excluded from the proposed stability control requirements because the speed at which these vehicles operate would make it unlikely that roll or yaw instability would occur." As the vast percentage of

school buses travel at lower speeds and largely in residential areas, NSTA fully supports this conclusion.

The school bus is the safest form of transportation currently available to students – and is eight times safer than riding in the family vehicle. While safety is our utmost concern and any enhancement that might improve safety is of interest to our association and our members, it is our belief that the ultimate cost must be compared to the gain of the enhancement. With that in mind, and given the accident rate of school buses in which the vehicle rolls over is incredibly rare, NSTA is more concerned that the financial burden of the additional technology could cause a reduction in the number of buses on the road, which would increase the number of children not riding school buses to school. It is our opinion that nothing should diminish the number of children riding school buses.

Thank you for the opportunity to comment on this Notice of Proposed Rulemaking. 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', with a stylized, flowing script.

Ronna Sable Weber
Executive Director
National School Transportation Association