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NSTA Executive Director
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The National School Transportation Association (NSTA) is pleased to offer these comments for your consideration.

The National School Transportation Association 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 multitude of services to our school district partners, from full turn-key service to management operations and specialized transportation. Our 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. Approximately 34.7% of the nation's fleet is contracted according to an April 2015 *School Bus Fleet* article.

As we all know, the debate on whether or not to require seat belts on large school buses has been ongoing for some time. Nationwide, yellow school buses transport 26 million students every school day, providing more than 9 billion student rides every year, with an average student occupant fatality rate of 4 students per year during school travel hours, and an injury rate of less than 0.04% annually. The average number of student fatalities among students who travel to school by any means other than a school bus is 629 annually. School buses are the safest form of transportation available today with children being 23 times safer on a school bus than being driven by a parent in the family car and 58 times safer than riding with a teen driver.

It is important to note that school buses are designed differently and comply with 36 Federal Motor Vehicle Safety Standards (FMVSSs) in addition to other design factors which have evolved over the years with one purpose in mind - passenger safety. The student passenger area is compartmentalized, which provides highly-effective safety and protection for all but the most severe and rare collisions. In addition, school bus drivers are continually trained to ensure they are providing the safest transportation possible. If you only examine the most severe and rare collision types, three-point seat belts appear to provide additional protection as long as they are being used and worn properly. The real question, however, is who should make the decision to put three-point seat belts on school buses and would the money spent on those three-point seat belts be the best use of the limited resources available to improve the safety for the greatest number of students traveling to and from school.

The National School Transportation Association agrees fully with the statement offered by the National Highway Traffic Safety Administration in its 2011 Petition of Denial to the Center for Auto Safety. *"We believe it is most appropriate if the decision to order seat belts on large school buses were left to the states and local jurisdictions rather than to NHTSA. States and local school districts are better able to recognize and analyze school transportation risks particular to their areas and identify approaches to best manage and reduce those safety risks. Local officials are in the best position to decide whether to purchase seat belts, since the officials must weigh a multitude of unique considerations bearing on purchasing decisions, especially when faced with budgetary constraints."*

Advances have been made in three-point seat belts in recent years that have lessened the concern of a change or reduction in capacity of a particular bus. Three-point seat belts would only be added to a

school bus at a cost and that additional cost will have to come from somewhere within a local budget. We are concerned that if mandated and unfunded, that additional cost could force some districts to make choices that may not be in the best interests of safety. Furthermore, we agree with and are most concerned about the comments offered by the National Highway Traffic Safety Administration in its 2011 Denial Petition, which stated, *“the agency estimates that the increased risk from students finding alternative, less safe means of getting to and from school could result in an increase of 10 to 19 school transportation fatalities annually.”*

If a school district has to choose between buying school buses with three-point seat belts or reducing the routes they currently offer either because they are forced to make financial decisions that could include cutting service or having an insufficient number of buses to meet their needs, then safety is no longer the first priority. That may sound extreme, but in these fiscally-conservative times, local school districts are making tough decisions just like this every day. More importantly, any time even one child is displaced from a school bus and forced to find a less safe means to and from school, any safety benefit realized by one child wearing a three-point seat belt is far outweighed by another child not riding to school on a school bus.

We would be remiss if we did not also express an additional safety concern that is also attendant to this issue. We would like to suggest that as the agency reviews this issue you carefully consider if the addition of three point seat belts would impede passenger evacuation in an emergency. In particular, we urge you to consider situations including driver incapacitation and bus rollover with a focus on the youngest passengers and those with disabilities.

As an Association, our greater safety concern lies with the fatality rate in the danger zone area around the bus and we believe that a focus by the National Highway Traffic Safety Administration in reducing those deaths could have a far greater impact on safety and save more lives. As noted in the 2010 Summary Report of the Alabama School Bus Seat Belt Pilot Project, *“Most school bus pupil fatalities occur outside buses in or near loading zones. If funding is to be spent on school bus safety, it appears more lives could be saved by investing in enhanced safety measures in loading/unloading zones. These treatments are likely more cost-effective than seat belts.”* We encourage the National Highway Traffic Safety Administration to consider all options for enhancing school bus passenger safety before deciding on one option in particular.

In conclusion, we thank you for your opportunity to be present today and we are happy to participate in this discussion. We firmly believe in the safety record of the yellow school bus, but remain willing to have a discussion about three- point seat belts or any other safety enhancement as long as science and data are considered in an effort to make the best decision possible. This is a complex issue and it should be weighed very carefully.

Thank you for your time.