U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Administrator

1200 New Jersey Avenue, SE
Washington, DC 20590

July 1, 2016

The Honorable Christopher A. Hart
Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

Dear Chairman Hart:

On June 27, 2007, the National Transportation Safety Board (NTSB) issued Safety Recommendations H-07-04 through -07 to the National Highway Traffic Safety Administration (NHTSA) regarding motorcoach safety and fire protection. These recommendations were issued as a result of NTSB's investigation of the September 23, 2005 motorcoach fire in Wilmer, TX during the evacuation of an assisted living facility in advance of Hurricane Rita.

Recommendations

H-07-04: Develop a Federal Motor Vehicle Safety Standard (FMVSS) to provide enhanced fire protection of the fuel system in areas of motorcoaches and buses where the system may be exposed to the effects of a fire.

H-07-05: Develop FMVSS to provide fire-hardening of exterior fire-prone materials, such as those in areas around wheel wells, to limit the potential for flame spread into a motorcoach or bus passenger compartment.

H-07-06: Develop detection systems to monitor the temperature of wheel well compartments in motorcoaches and buses to provide early warning of malfunctions that could lead to fires.

H-07-07: Evaluate the need for a FMVSS that would require installation of fire detection and suppression systems on motorcoaches.

Response: Developing FMVSS to address H-07-04 and H-07-05 would require fire protection systems around the fuel lines and exterior materials, and/or better locating the fuel lines. The former requires additional cost, which alternatively could be avoided with appropriate placement of the fuel lines. Such placement is highly dependent on vehicle design and not conducive to a performance-based FMVSS. Furthermore, in the 2016 update of a 2009 Federal Motor Carrier Safety Administration (FMCSA) report, "Motorcoach Fire Safety Analysis," FMCSA noted that there was an association between out-of-service violations and the risk of fire involvement.

Since FMCSA has significantly increased its safety enforcement of motorcoaches and other commercial passenger carriers in recent years, we believe there will be significantly fewer bus fires initiating in the wheel-well area, in general. Furthermore, our data show that such bus fires rarely result in occupant fatalities or injuries.

Therefore, NHTSA believes there is greater benefit in alternative strategies, such as improving motorcoach egress to ensure occupant safety in the event of a fire, rather than fire hardening exterior bus materials around the wheel-well area. For these reasons, NHTSA will not pursue enhanced fire protection of the fuel system and fire hardening of exterior materials, as recommended in H-07-04 and -05. We intend no further action on these two Safety Recommendations and request that they be closed.

In addressing H-07-06 and -07, NHTSA completed research with Southwest Research Institute in the development of test procedures evaluating fire detection and fire suppression systems. Our evaluation found that these test procedures are specific to particular bus designs and consequently are not conducive to a FMVSS. Alternatives to regulatory action, including industry standards and insurance incentives based on the presence of fire detection and suppression systems, may be a more prudent course of action. Therefore, our development and evaluation is complete and we intend no further action on Safety Recommendations H-07-06 or H-07-07.

In summary, we are requesting that Safety Recommendations H-07-04 - 07 be closed, as alternate, non-regulatory solutions provide more realistic safety benefits. If you have any questions, or require additional information, please contact me or Ms. Melanie O'Donnell, our NTSB Liaison, at (202) 366-0689, or via e-mail at melanie.odonnell@dot.gov.

Sincerely yours,

Mark R. Rosekind

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