



May 7, 2012

**RESPONSE**  
**National Transportation Safety Board**  
**Safety Recommendation H-11-48**

The National Association of State Directors of Pupil Transportation Services (NASDPTS) appreciates the opportunity to respond to National Transportation Safety Board (NTSB) Safety Recommendation H-11-48 issued to NASDPTS, The National Association for Pupil Transportation (NAPT) and The National School Transportation Association (NSTA). Several aspects of NASDPTS' actions to address NTSB Safety Recommendation H-11-48 were completed prior to today's formal response.

The National Association of State Directors of Pupil Transportation Services (NASDPTS) was founded in 1968, and represents a cross section of individuals and organizations involved in the safe transportation of school children. As the Association's name indicates, members include those individuals with the primary responsibility for school transportation in each state. In addition, school bus manufacturers and other industry suppliers, school transportation contractors, and state associations whose members include school transportation officials, drivers, trainers and technicians are also members of affiliated councils within the association. This diversity in membership combined with the day-to-day involvement of the state directors in policy matters, creates a unique perspective on pupil transportation issues.

The NTSB Safety Recommendation to the associations addresses the need to inform association members of specific aspects of the Gray Summit, Missouri, accident and implement solutions. The Safety Recommendation was the result of the NTSB's investigation of a multivehicle collision that occurred near Gray Summit on August 5, 2010, as traffic slowed in the approach to an active work zone on eastbound 44 (I-44), and motor vehicles merged from the closed left lane to the right lane. A 2007 Volvo truck-tractor with no trailer was traveling eastbound in the right lane and had slowed or stopped behind traffic. About 10:11 a.m. central daylight time, a 2007 GMC Sierra extended cab pickup truck merged from the left to the right lane and struck the rear of the Volvo tractor. The collision was the first in a series of three.

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A convoy of two school buses from St. James High School, St. James, Missouri, was traveling eastbound in the right lane of I-44, approaching the slowed traffic and the collision ahead. The lead bus was a 71-passenger school bus, occupied by 23 passengers. Following closely behind the lead bus was a 72-passenger school bus, occupied by 31 passengers. Seconds after the lead bus passed a motorcoach that had pulled over and stopped on the shoulder, it struck the rear of the GMC pickup. This collision—the second in the series—pushed the pickup forward, overturning it onto the back of the Volvo tractor. The front of the lead bus was ramped upward, it came to rest on top of the GMC pickup and the Volvo tractor. Moments later, the following school bus struck the right rear of the lead bus.

The driver of the GMC pickup truck and one passenger seated in the rear of the lead school bus were killed. A total of 35 passengers from both buses, the two bus drivers, and the driver of the Volvo tractor received injuries ranging from minor to serious. 18 people were uninjured. As a result of this investigation, the NTSB has issued 13 safety recommendations, including the one below which is addressed to NASDPTS, NAPT and NSTA.

*Inform your members of the circumstances and events that contributed to the Gray Summit accident; discuss solutions for the driver, pretrip evacuations briefings, and vehicle, inspection, and technological issues presented in the report; and urge the implementation of these solutions among your members. (H-11-48)*

NASDPTS is pleased to report that it has supported NTSB Safety Recommendation H-11-48 by taking the following actions:

- Advised NASDPTS membership in a December 12, 2011 email of the NTSB Board meeting on the Gray Summit, Missouri school bus crash investigation and encouraged participation (email attached).
- Advised NASDPTS membership in a December 13, 2011 email of the NTSB press briefing to announce 13 new Safety Recommendations resulting from the NTSB investigation of the Gray Summit school bus crash and encouraged participation (email attached).

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- Advised NASDPTS membership in a December 14, 2011 email of the NTSB link for the report synopsis of the Gray Summit school bus crash and provided the draft of the NTSB Safety Recommendation to NASDPTS, NAPT and NSTA (email attached).
- Advised NASDPTS membership in a February 3, 2012 email that the Gray Summit School Bus Accident Report had been released and provided the access information (email attached).
- Advised NASDPTS membership in a February 9, 2012 email of the Safety Recommendations resulting from the investigation of the Gray Summit school bus crash (email attached).

Additionally, NASDPTS has requested that NTSB designate an NTSB staff member to give a thorough, technical presentation on the Gray Summit school bus crash to NASDPTS members at the annual NASDPTS conference in October 2012. That presentation should include all facets of the Gray Summit investigation that relate to school bus operations. NASDPTS will, in turn, post the NTSB presentation on the NASDPTS website and encourage viewing by members not in attendance at the initial conference presentation.

NASDPTS will survey its state director members regarding requirements for and content of school activity pretrip evacuation briefings. NASDPTS will then create and disseminate a model pretrip evacuation briefing and encourage states without a pretrip evacuation briefing requirement to establish one.

Additionally, NASDPTS will encourage its members to ensure that state and local bus driver training programs include a thorough overall review of the circumstances of the NTSB's findings and recommendations in the Gray Summit investigation. NASDPTS will encourage states and local education agencies (LEA's) to emphasize those aspects directly pertaining to student transportation, including: training and reminding drivers of appropriate visual scanning techniques and maintaining proper following distance; recommending that all students participate in school bus evacuation drills, and ensuring that school bus inspectors and maintenance technicians are aware of guidelines and best practices for inspection and condition of all mechanical and safety systems on the bus, including braking systems.

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NTSB determined that the probable cause of the initial Gray Summit crash was driver distraction, likely due to a text messaging conversation being conducted by the GMC pickup driver which resulted in his failure to notice and react to a Volvo tractor that had slowed or stopped in response to a queue that had developed in a work zone. NASDPTS has consistently supported NTSB and federal agency recommendations to lesson the occurrence of distracted driving accidents. NASDPTS has also supported state requirements to ban texting and cell phone use by school bus drivers.

NASDPTS supports NTSB Safety Recommendations resulting from the Gray Summit school bus crash investigation issued to the National Highway Traffic Safety Administration (NHTSA), the 50 states and the District of Columbia, the state of Missouri, the Missouri Department of Elementary and Secondary Education, CTIA—The Wireless Association and the Consumer Electronics Association.

NASDPTS has historically and consistently worked closely with NTSB, NHTSA and other federal agencies in all facets of student transportation safety. The outstanding and well documented safety record of school bus transportation is due to many factors including: Federal Motor Vehicle Safety Standards, commercial driver license (CDL) requirements, investigations and recommendations of the NTSB and diligent state and local driver screening and training practices. Federal agencies and professional associations must continue to take all reasonable actions to maintain and improve school bus safety.

Thank you for the opportunity to respond to the Safety Recommendations resulting from the NTSB investigation of the Gray Summit school bus crash. For further information, contact NASDPTS Executive Director, Bob Riley at (970 871 1784) or [execdir@nasdpts.org](mailto:execdir@nasdpts.org).

Attachments: NASDPTS Email to Members, December 12, 2011  
NASDPTS Email to Members, December 13, 2011  
NASDPTS Email to Members, December 14, 2011  
NASDPTS Email to Members, February 3, 2012  
NASDPTS Email to Members, February 9, 2012

