



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

JAN 23 2004

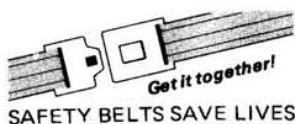
Ms. Deborah Lincoln  
President  
National Association of State Directors  
of Pupil Transportation Services  
6298 Rock Hill Road  
The Plains, VA 20198-1916

Dear Ms. Lincoln:

Thank you for your letter concerning the issue of lap belts on large school buses. I apologize for the delay in responding. Your letter has raised many important issues related to school bus safety and about the National Highway Traffic Safety Administration's (NHTSA) policy on lap belts in school buses.

In your letter you discuss your concern that States and local jurisdictions considering requiring lap belts on newly purchased large school buses may not fully understand the results and implications of the dynamic tests conducted by NHTSA. The agency's tests compared compartmentalization, lap belts, and lap/shoulder belt restraint systems, and were documented in the 2002 report to Congress. You have asked the agency to answer three questions that you believe will help provide guidance to the States or other jurisdictions. I appreciate the opportunity to clarify the importance of NHTSA's test results and provide guidance to the States and local school jurisdictions in their decisions to most safely transport school children.

First of all, school transportation policymakers should be aware of the National Academy of Sciences Special Report No. 269, "The Relative Risks of School Transportation: A National Perspective and Guidance for Local Community Risk Assessment." The report is available from the National Academies Press at [www.nap.edu/catalog/](http://www.nap.edu/catalog/) (Record ID 10409). It shows that school bus transportation results in far fewer fatal injuries than any other mode of transportation to school, including walking, bicycling, or passenger vehicles. Although your letter specifically addresses the issue of lap belts on large school buses, we believe it is important to reiterate to the States and other jurisdictions that compartmentalization has proven to be a very effective restraint system in those buses. In addition to the potential adverse safety implications described below, decisions to install lap belts in large school buses must take into account other considerations (e.g., increased capital costs, reduced seating capacities, etc.) that could result in the unintended consequence of parents or guardians seeking alternative and potentially less safe means of travel for their children to and from school.



AUTO SAFETY HOTLINE  
(800) 424-9393  
Wash. D.C. Area (202) 366-0123

In specific response to your questions, NHTSA is providing the following information:

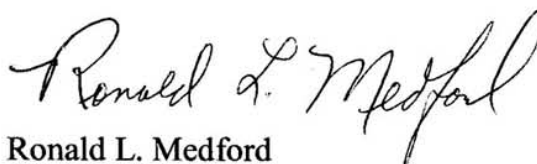
You asked if NHTSA believes its past letters of interpretation and/or public statements concerning the installation of lap belts in new large school buses are still appropriate. Yes, we believe they are. Our research has shown that, in severe frontal crashes, lap belts do not provide additional safety benefits to the protection afforded by compartmentalization in large school buses, and could increase the incidence of serious neck injuries and abdominal injury among young passengers. It is important to note that the results from NHTSA's recent research program were limited to only two crash conditions--one frontal impact at 30 mph and one side impact test. The agency did not evaluate the performance of lap and lap/shoulder belts to determine their performance under less severe impact conditions or in other crash modes such as rear or rollover.

You also asked for NHTSA's specific recommendation to New York, New Jersey, Florida, and any local school jurisdictions that currently require lap belts in all new large school buses. We do not have any specific recommendations at this time. In a final rule published in July 2003, we announced that we are developing proposed requirements for voluntarily installed lap/shoulder belts in large school buses. Such requirements are likely to include proposals for belt fit, belt and seat anchorage, and seat back strength. However, considerable effort remains to be done before NHTSA will be able to issue a proposal.

Finally, you asked what NHTSA's specific recommendations are for any State or local school jurisdiction considering legislation to require lap belts in all new large school buses. Our recommendation would be that such legislation should be considered very cautiously, since as noted above, our research has shown that in severe frontal crashes, lap belts do not provide safety benefits beyond the protection afforded by compartmentalization in large school buses, and could increase the incidence of serious neck injuries and abdominal injury among young passengers. Furthermore, such legislation has the potential of putting children at greater risk if it causes them to seek alternative transportation to and from school. While safety belts are required in light passenger vehicles to control occupant crash forces and prevent ejection, the crash forces for large school buses are much lower than in passenger vehicles. Also, ejections from large school buses are extremely rare.

I hope these responses are helpful to your Association in providing guidance to the States and other jurisdictions in making their decisions regarding the installation of lap belts on large school buses. If we can be of further assistance, please contact me at (202) 366-9700.

Sincerely yours,



Ronald L. Medford  
Senior Associate Administrator for  
Vehicle Safety