January 14, 2016

The Honorable Mark R. Rosekind, PhD.
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE, West Building
Washington, DC  20590

Dear Dr. Rosekind:

Our members and America’s transported school students benefited greatly from your joint presentation on November 8, 2015, to the annual conferences of the National Association of State Directors of Pupil Transportation Services (NASDPTS) and the National Association for Pupil Transportation (NAPT). NASDPTS applauds your and NHTSA’s commitment to the unparalleled safety provided for the nation’s students who ride in school buses, including your call for the enhanced safety that installing three-point lap/shoulder belts in new school buses will provide. Your position and ours are consistent, as reflected in our 2014 Position Paper, “The Equipping and Use of Passenger Lap/Shoulder Belts in School Buses,” and in our comments to the NHTSA rulemaking in 2008.

In your remarks you announced that NHTSA will be seeking comments and assistance from the six states that already have various iterations of school bus seat belt laws. Your agency recently asked the governors of the six states (California, Florida, Louisiana, New Jersey, New York, and Texas) to send local and state representatives to a meeting in Washington, DC, on January 27, 2016. We support NHTSA’s efforts to draw upon the experience of states and local school districts.

NASDPTS understands and agrees that there is no direct role for us or other groups in this focused, “six states” meeting. Nevertheless, we are available and anxious to assist the agency in school bus safety initiatives, so we would encourage follow-up meetings with NHTSA and its staff as the agency develops and implements its specific plans to implement your priorities. NASDPTS will be a willing partner in any such meetings.

We also stand ready to assist NHTSA in its renewed efforts to mitigate the hazards to students who are outside their school buses while waiting at school bus stops and while loading or unloading. The Kansas Department of Education conducts annual surveys to document loading and unloading fatalities, and NASDPTS conducts annual surveys to document the incidence of illegal passing of school buses. The results of these surveys demonstrate that eliminating student fatalities around school buses remains an important priority.
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While school buses are by far the safest choice, maintaining and improving overall student safety is the primary goal of the half million professionals throughout the United States who work daily to get students to and from school and school activities. Please let us know how NASDPTS and its members may continue to assist your agency in its commitment to student safety.

Sincerely,

[Signature]

Leon Langley, President  
National Association of State Directors of Pupil Transportation Services