



September 14, 2018

The Honorable Raymond P. Martinez
Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: Agency Information Collection Activities; Proposals, Submissions, and Approvals: Truck and Bus Maintenance Requirements and Their Impact on Safety, FMCSA-2018-0189

Dear Administrator Martinez:

On behalf of the American Bus Association (ABA), we appreciate the opportunity to comment on the Federal Motor Carrier Safety Administration's (FMCSA's) "Agency Information Collection Activities; Proposals, Submissions, and Approvals: Truck and Bus Maintenance Requirements and Their Impact on Safety, FMCSA-2018-0189" (Notice).

ABA represents over 800 motor carriers of passengers, operating over the road in intrastate and interstate commerce. Our members operate all manner of bus operations, including intercity scheduled service, charter and tour operations, school buses, airport shuttles, contracted transit service and employee shuttle services.

ABA has attentively engaged with FMCSA and Virginia Polytechnic University in educating the industry on this highly anticipated research effort during industry meetings focusing on motorcoach maintenance and safety over the past 2 years. ABA's collection of safety and maintenance professionals, whom form the membership of our Bus Industry Safety Council (BISC) and Bus Maintenance and Repair Council (BusMARC) are eager and ready to participate in a study to assess these bus maintenance requirements and their impact on safety. This Notice is a welcome sign that efforts are now underway to actively pursue this research endeavor.

ABA is in full support of this information collection request and stands ready to offer any appropriate forum to assist in any outreach or promotion of industry participation in this initiative. We look forward to the benchmarking that the resulting study will provide and analyzing the findings for correlations between maintenance practices and safe operations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brandon Buchanan", written in a cursive style.

Brandon Buchanan
Director of Regulatory Affairs