

December 2, 2019

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

RE: Docket No. FMCSA-2019-0191
Renewal of Currently-Approved Financial Responsibility for Motor
Carriers of Passengers and Property Information Collection Request
Written Comment from the National School Transportation Association
to the Federal Motor Carrier Safety Administration

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer comments to the Federal Motor Carrier Safety Administration (FMCSA) Notice regarding the Agency's intent to renew a currently-approved information collection request regarding motor carriers of passengers and property financial responsibility, as published on October 1, 2019, in Volume 84, Number 190 of the Federal Register.

NSTA is the leading resource for school bus transportation solutions and the voice for private contractors for over 55 years. NSTA was formed in 1964 as a membership organization for school bus contract-operators engaged primarily in transporting students to-and-from school and school-related activities. Our members range in size from small family businesses serving one school district, to large corporations operating tens of thousands of buses across multiple states committed to the safe, efficient and economical transportation of our nation's children and future leaders.

School bus transportation is the safest way to transport a child to and from school – even safer than walking, biking, or riding in a parent or fellow student's car. In fact, students are seventy times more likely to arrive at school safely when being driven by a school bus, than they would if they were riding in a car.¹ Each day, 26 million children are transported to-and-from school on an estimated 480,000 yellow school buses. Daily, the lives of children on a school bus are entrusted to certified school transportation professionals, who have received special training² and have the experience to ensure the safe transport of children to-and-from school and school related activities.

In this filing, FMCSA seeks to renew currently-approved information collection forms MCS-82B and MCS-90B. These forms are required under 49 CFR 387.33, with the express purpose that the Agency and general public are able to verify that a motor carrier maintains required minimum

levels of insurance - as identified through these forms. As such, NSTA's school transportation contractor members are required to complete these forms to ensure transparency with respect to providing adequate proof of liability insurance. The result of this activity means that reputable contractors are able to demonstrate proof of a safe and reliable transportation operation. Conversely, contractors not operating in the public interest should not be able to satisfactorily demonstrate compliance with this rule.

NSTA believes that this form provides an opportunity to identify carriers who are non-compliant, and gives reputable operators a platform to further demonstrate their commitment to safe and reliable student transportation. Therefore, NSTA supports FMCSA's proposal to renew the MCS-82B and MCS-90B information collection to verify proof of motor carrier financial responsibility. In its current form, we believe that adherence to this rule places a minimal filing burden on our members, and can have the ancillary effect of highlighting the school transportation industry's commitment to safety. Just as FMCSA's top priority is to reduce crashes, injuries and fatalities involving large trucks and buses, NSTA's priority is to ensure school transportation remains the safest form of student transportation.

NSTA appreciates the opportunity to offer comments on the FMCSA Notice, Docket No. FMCSA-2019-0191, and looks forward to continuing working in concert with the Agency on this and future proposed rules. If further clarification is required, please do not hesitate to contact me at 703-684-3200 ext. 700, or by e-mail at cmacysyn@yellowbuses.org.

Sincerely,



Curt Macysyn
Executive Director
National School Transportation Association

¹ U.S. Department of Transportation, National Highway Traffic Safety Administration, "School Bus Safety," <https://www.nhtsa.gov/road-safety/school-bus-safety>; see also, American School Bus Council, "fact: The School Bus is the Safest Way to Travel to and from School," <http://schoolbusfacts.com/wp-content/uploads/2016/12/Safety-Benefits.pdf>

² See American School Bus Council "Safety Features of the School Bus," <http://schoolbusfacts.com/wp-content/uploads/2017/01/SafetyFeatures.pdf>