



October 27, 2010

**RESPONSE**  
**National Transportation Safety Board**  
**Safety Recommendation H-09-14**

The National Association of State Directors of Pupil Transportation Services (NASDPTS) appreciates the opportunity to respond to National Transportation Safety Board Safety Recommendation H-09-14, issued to NASDPTS and the National Association for Pupil Transportation (NAPT). Several aspects of the Association's actions to address the NTSB recommendation were completed well prior to today's formal response; however, we apologize for the delay in this formal response and appreciate NTSB's patience.

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 a number of state associations whose members include school transportation officials, drivers, trainers, and technicians also are 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.

In May 2005, the National Transportation Safety Board (NTSB) began its investigation of a school bus accident that occurred in Liberty, Missouri. During the course of the investigation, information was uncovered that suggested pedal misapplication as a factor in the accident; that is, depressing the accelerator instead of, or in addition to, the brake pedal.

The NTSB subsequently investigated four additional accidents involving heavy vehicles in which pedal misapplication was determined to be a factor. Three of the four additional accidents investigated involved school buses. Despite varying circumstances, these five accidents share common elements. In all five, the drivers either reported a loss of braking or were observed by vehicle occupants to be unsuccessfully attempting to stop the vehicles, though no evidence of braking system failure was found.

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As a result of the investigation of the five accidents covered in the Special Investigation Report (SIR) NTSB/SIR-09/02, *Pedal Misapplication in Heavy Vehicles*, the NTSB made the following recommendation to NASDPTS and NAPT:

Advise your members - through your newsletters, website and conferences – of the following safety issues: (1) the risk of pedal misapplication and the need to educate school bus drivers about such incidents, and the need to develop and implement plans to ensure that school bus drivers undergo annual refamiliarization training on all bus types that they might drive; and (2) the risk of unintended acceleration during loading and unloading activities, as exemplified by the Falls Township, Pennsylvania accident on January 12, 2007; and suggest possible mitigation strategies, such as installing bollards or starting buses only after loading is complete. (H-09-14)

NASDPTS is pleased to report that it has supported NTSB Safety Recommendation H-09-14 by taking the following actions:

- Advised NASDPTS membership in a September 1, 2009 email of the NTSB Board meeting on pedal misapplication in heavy vehicles and encouraged participation (email attached).
- Advised NASDPTS membership in a September 2, 2009 email of the general nature of the NTSB Safety Recommendations and included attachments of the NTSB press release and the NTSB synopsis of the Pedal Misapplication SIR (email, press release and SIR synopsis attached).
- As follow-up, NASDPTS will advise its membership of NTSB Safety Recommendation H-09-14 in a NASDPTS Guidance Document that will summarize the issue and include a copy of Safety Recommendation H-09-14.
- The Guidance Document to members and all related documents will be posted on the NASDPTS website; all members will be notified and encouraged to distribute the guidance within their states and student transportation associations.
- We invited NTSB to attend the annual NASDPTS conference, November 1, 2009, and present a report on NTSB activities to include the NTSB/SIR-09/02, *Pedal Misapplication in Heavy Vehicles*, and the resulting Safety Recommendations. Dennis Collins, NTSB Investigator, made the presentation to NASDPTS membership. Dwight Foster of NTSB will again report to NASDPTS members on this and other issues on October 31, 2010 at the annual NASDPTS conference.

In the second part of its Safety Recommendation, NTSB suggested that we advise our members of possible hazard mitigation strategies, such as installing bollards or starting buses only after loading at schools is complete, to reduce the risk of unintended acceleration during loading and unloading activities, as exemplified by the Falls Township, Pennsylvania accident on January 12, 2007. We fully concur and will advise our members about these strategies.

NASDPTS wishes to advise NTSB, however, that in many cases state directors of pupil transportation have no authority or input into improving the design of school facilities or funding such improvements. Consequently, most of our members are not in a position to effect such improvements. NTSB may wish to advise national school facilities and school administration associations directly regarding Safety Recommendation H-09-14. The national association for school facility planners is the Council of Educational Facility Planners International (CEFPI) at [www.cefpi.org](http://www.cefpi.org). We would be happy to assist NTSB by communicating this response directly to CEFPI.

While physical facilities improvements are sometimes not within our purview, our members frequently have more direct involvement in influencing procedures. Many of our members provide guidance to local school districts and administrators to improve their procedures for loading and unloading buses on school campuses. In our Guidance Document and in our publication of this response we will encourage our members to suggest to local school districts and schools that they start buses only after loading is complete. It should be noted that many schools already follow this recommended safety practice.

As a result of the investigation of the five accidents covered in the SIR, NTSB made the following safety recommendations to the National Highway Traffic Safety Administration (NHTSA):

Require the installation of brake transmission shift interlock systems or equivalent in newly manufactured heavy vehicles with automatic transmissions and other transmissions susceptible to unintended acceleration associated with pedal misapplication when starting from a parked position. (H-09-11)

Analyze pedal configurations in heavy vehicles, including innovative designs, to determine the effect of pedal design on the driving task, examining-among other things-pedal error, reaction time, and driver acceptance and driver adaptation. (H-09-12)

Once the analysis of pedal configurations requested in Safety Recommendation [2] is complete, publish pedal design guidelines for designers and manufacturers. (H-09-13)

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Additionally, NTSB reiterated and reclassified Safety Recommendations H-99-53 and -54, as “open-unacceptable response.” Recommendation H-09-53 to NHTSA required that all school buses and motorcoaches manufactured after January 1, 2003 be equipped with on-board recording systems that record specifically defined vehicle parameters. The on-board recording system should record data at an acceptable sampling rate and be capable of preserving data in the event of a crash or electrical power loss. The on-board recording system should be mounted to the bus body, not the chassis.

NASDPTS supports these Safety Recommendations made to NHTSA and the reiteration and reclassification of Safety Recommendations H-99-53 and -54 as open-unacceptable response. As clarification, we concur with what we believe to be the NTSB’s intent that the recommendations should apply only to newly manufactured school buses and other subject vehicles.

NASDPTS has historically and consistently worked closely with the 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, diligent state and local driver screening and training practices, and the high level of supervision in loading and unloading areas. 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 Highway Safety Investigation Report, *Pedal Misapplication in Heavy Vehicles*. 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, September 1, 2009  
NASDPTS Email to Members, September 2, 2009  
Synopsis of NTSB SIR on Pedal Misapplication in Heavy Vehicles

September 1, 2009

TO: All NASDPTS Members

We have just learned that the National Transportation Safety Board (NTSB) is conducting a webcast of its Board meeting today that will include discussion of its investigations, including school bus crashes in which "pedal misapplication" was implicated. That portion of the meeting, according to the webcast notice I just viewed, will resume at 1:00 p.m. EDT. You can get to the webcast of today's Board meeting at: <http://www.nts.gov/Events/boardmeeting.htm>

You may have greatest success by clicking on the Windows Media Player link for today's webcast at the above site, then clicking on "Launch in external player." Thanks to Dwight Foster of NTSB for informing us about this event.

Thanks,

Charlie

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**LEARNING STARTS WITH TRANSPORTATION**

September 2, 2009

NASDPTS Members,

I hope that some of you were able to watch the National Transportation Safety Board (NTSB) meeting webcast on Tuesday, September 1. It was obvious from comments made during the webcast that NTSB considers NASDPTS a key player in school bus safety.

NTSB Chairman, Deborah A. P. Hersman spoke positively about the safety record of school buses, while expressing a keen interest in further improvements. She mentioned the unique circumstance that all of the current NTSB Board Members have school age children. Dennis Collins, an NTSB staff member who spoke extensively during the Board meeting, is scheduled to present these and other NTSB findings and recommendations at our annual conference in Louisville in October, a point that was acknowledged by him and Chairman Hersman during the webcast.

The September 1, 2009, NTSB meeting was held to discuss a Highway Special Investigation Report, Pedal Misapplication in Heavy Vehicles (SIR-09/XX). In May, 2005, the NTSB began its investigation of a school bus accident that occurred in Liberty, Missouri. During the course of the investigation, information was uncovered that suggested pedal misapplication as a factor in the accident--that is, depressing the accelerator instead of, or in addition to, the brake pedal. The NTSB subsequently investigated four additional accidents involving heavy vehicles in which pedal misapplication was determined to be a factor. Those accidents included several school bus and transit bus accidents.

The NTSB will issue its final report in a few weeks and it will include recommendations to NASDPTS and NAPT to advise their members through newsletters, websites and conferences of the following safety issues: (1) the risk of pedal misapplication and the need to educate bus drivers about such incidents, and the need to implement plans to ensure that school bus drivers undergo annual refamiliarization training on all bus types that they might drive; and (2) the risk of unintended acceleration during loading and unloading activities and mitigation strategies.

NTSB recommendations to NHTSA will include: (1) require the installation of brake transmission interlock systems in heavy vehicles with automatic transmissions; (2) analyze pedal configurations in heavy vehicles; and (3) publish pedal design guidelines for designers and manufacturers.

Additionally, NTSB will reiterate previously issued Safety Recommendations H-99-53 and -54 which would require on-board recording systems and the development and implementation of industry standards for on-board recording of bus crash data.

NASDPTS will continue to monitor these NTSB recommendations and keep you advised. The NTSB press release follows and a synopsis of the Safety Board's recommendations presented at the NTSB September 1, 2002 meeting is attached.

Bob

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NTSB PRESS RELEASE  
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National Transportation Safety Board  
Washington, DC 20594

FOR IMMEDIATE RELEASE: September 1, 2009

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NTSB CALLS FOR IMPROVED TECHNOLOGY, PEDAL DESIGN TO MINIMIZE RISK OF PEDAL MISAPPLICATION IN HEAVY VEHICLES

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In a Special Investigation Report (SIR) adopted today, the National Transportation Safety Board concluded that pedal misapplication was a factor in five heavy vehicle accidents investigated by the Board between 2005 and 2008. Pedal misapplication occurs when a driver depresses the accelerator instead of, or in addition to, the brake pedal.

The report was prompted by the Board's investigation of a school bus accident that occurred in Liberty, Missouri, in May 2005. The NTSB subsequently investigated four additional accidents that shared common elements. In all five, the drivers either reported a loss of braking or were observed by vehicle occupants to be unsuccessfully attempting to stop the vehicles, though no evidence of braking system failure was found.

The Board noted that the purpose of the report was not only to review these recent investigations and the Board's previous work on pedal misapplications, but also to examine the potential benefits of a variety of possible technological solutions and to present safety recommendations designed to prevent or mitigate the consequences of pedal misapplication involving heavy vehicles.

As a result of this report, the Board called upon the National Highway Traffic Safety Administration (NHTSA) to require the installation of technology in heavy vehicles susceptible to pedal misapplication to prevent unintended acceleration when starting from a parked position. The Board also recommended that NHTSA both conduct an analysis of pedal configurations in heavy vehicles and study the effect of pedal design on the driving task. Upon completion of the analysis, the Board recommended that NHTSA publish pedal design guidelines for designers and manufacturers. Additional recommendations were made to the National Association of State Directors of Pupil Transportation Services and the National Association for Pupil Transportation to advise their members of the dangers of pedal misapplication and to consider driver refresher training and suggested mitigation strategies.

The NTSB also reiterated and reclassified two 1999 safety recommendations made to NHTSA requiring event data recorders on school buses and motorcoaches manufactured after January 1, 2003, and for NHTSA to work with other government agencies and industry to develop and implement standards for on-board recording of bus crash data.

A synopsis of the Special Investigation Report, including the findings, probable cause determinations for two accidents, and safety recommendations, can be found on the Board's website at [www.nts.gov](http://www.nts.gov). The complete report will be available within several weeks.

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