

School Bus Manufacturers Technical Council

July 31, 2015

The Honorable Christopher A. Hart
Chairman
National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Re: H-13-37

Dear Chairman Hart:

This letter is in response to a recommendation from the National Transportation Safety Board (NTSB) to the School Bus Manufacturers Technical Council (SBMTC). The SBMTC is a council of the National Association of State Directors of Pupil Transportation Services (NASDPTS). The NTSB Safety Recommendation was contained in Highway Accident Report NTSB/HAR-13/01, School Bus and Truck Collision at Intersection Near Chesterfield, New Jersey, February 16, 2012. This report also contained an investigation of another school bus crash, in Port St. Lucie, Florida which occurred on March 26, 2012, where a truck-tractor semitrailer struck a large school bus, also resulting in a severe lateral impact collision.

From the investigation of the two crashes the NTSB issued Safety Recommendation H-13-37 to the SBMTC that states:

H-13-37

Develop a recommended practice for establishing and safeguarding the structural integrity of the entire school bus seating and restraint system, including the seat pan attachment to the seat frame, in severe crashes—in particular, those involving lateral impacts with vehicles of large mass.

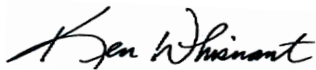
The SBMTC believes that any recommended practice we develop on our own would not have lasting or binding results in the final product for years to come. This is because the SBMTC has neither the authority nor a mandate to enforce regulations within the school bus industry. Therefore, we believe the best way to develop such a recommended practice or regulation is to petition the National Highway Traffic Safety Administration (NHTSA) to study the data contained in the NTSB crash report and to conduct any additional studies and develop new regulation(s) and/or changes in current regulation(s), if the agency's review indicates that such actions are warranted. This approach ensures that all systems required on school buses work in conjunction with any new regulation and that there are no unintended consequences of such changes. Implementing the NTSB recommendation by means of a federal safety standard, if warranted, would require that all school bus and school bus seat manufacturers currently in the market and any potential new manufacturers adhere to the same level of compliance testing and quality assurance that goes into making school buses the safest form of transportation in the world today.

NTSB Chairman Christopher A. Hart
July 31, 2015
Page two

We believe that manufacturers are already incorporating lateral seat stability into their seat designs, pursuant to changes in Federal Motor Vehicle Safety Standard (FMVSS) 222 that became effective for all new school buses on October 21, 2009. Nevertheless, our petition to NHTSA (attached) requests that the agency review lateral stability as it pertains to seat cushion retention requirements. We will also inform the members of NASDPTS of this request, which will include the NASDPTS Supplier Council, within which all current school bus original equipment manufacturers and passenger seat manufacturers are represented.

We value the opportunity to respond to the NTSB's important safety recommendation and remain available to assist the Safety Board.

Sincerely,

A handwritten signature in black ink that reads "Ken Whisnant". The signature is written in a cursive, flowing style.

Ken Whisnant
Chairman, School Bus Manufacturers Technical Council
kenneth.whisnant@daimler.com

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

Attachment: Petition to NHTSA