



Preventing accidental injury.

January 22, 2008

Docket Management Facility
M-30
U.S. Department of Transportation
West Building
Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Docket No. NHTSA-2007-0014, Federal Motor Vehicle Safety Standards; Seating Systems, Occupant Crash Protection, Seat Belt Assembly Anchorages, School Bus Passenger Seating and Crash Protection

I. General Background on Safe Kids USA

Safe Kids USA is pleased to submit comments regarding Docket No. NHTSA-2007-0014, a notice of proposed rulemaking (NPRM) to revise the federal motor vehicle safety standards for school buses. Although Safe Kids does not have the technical and engineering expertise to comment specifically on the technical aspects of school bus seating, we generally support the goals and provisions contained in the NPRM.

Safe Kids USA is a member of Safe Kids Worldwide, a global network of organizations whose mission is to prevent accidental childhood injury, a leading killer of children 14 and under. More than 450 coalitions in 16 countries bring together health and safety experts, educators, corporations, foundations, governments and volunteers to educate and protect families. Each year in the U.S., more than 5,800 children die, nearly 120,000 are permanently disabled, and more than 14 million (one child in four) are hurt seriously enough to require emergency medical care due to unintentional injury.

Safe Kids Buckle Up, our comprehensive child passenger safety program, enables the Safe Kids USA's nationwide coalition network to reach out to local communities with prevention messages, safety devices and hands-on training. Our experiences over the years in the occupant protection field have informed our comments about school buses below.

II. NHTSA Guidance to State and Local Jurisdictions on Installing Safety Belts on Large School Buses

Along with many other organizations and school districts around the nation, Safe Kids has struggled with its position on how to best protect children in large school bus-related crashes. We know from our vast and deep experience in protecting children in motor vehicles that the very best way to keep children safe in cars is by the consistent use of lap and shoulder belts (along with a child safety seat when appropriate) on every single ride. In fact, Safe Kids supported the expansion of lap and shoulder belts to the middle seating position throughout the entire passenger car fleet. There is no question that both lap and shoulder belts are critical safety features to be used at all times when on the road.

Intuitively, Safe Kids believes that the same energy absorbing characteristics provided by lap and shoulder belts in cars would also be beneficial for large school buses, and according to NHTSA they do. But as NHTSA has said for many years, retrofitting large school buses with lap and shoulder belts would have known negative consequences (for example, reduced seating capacity resulting in a diversion to other more dangerous modes of transport and increased capital costs that divert funding from other more critical transportation safety efforts). Given NHTSA's in depth expertise in this area, its continuous consideration of the issue, its past confidence in "compartmentalization" alone, the excellent safety record of large school buses and the negative consequences mentioned above, Safe Kids has deferred and supported NHTSA's historical position on the matter.

NHTSA has now and again revisited its position and has recently published new, although not dramatically different, guidance to state and local jurisdictions on installing lap and shoulder belts on large school buses. NHTSA is now recommending that if jurisdictions have sufficient funds to retrofit buses with lap and shoulder belts and it has enough buses in its fleet to avoid the diversion of students to more dangerous transportation modes that naturally accompanies any effort that reduces available seating positions, then transportation providers should adopt a retrofit policy for their communities.

In other words, NHTSA is recommending that transportation providers consider lap and shoulder belts in large school buses, which the agency believes would provide incremental safety benefits, only if there would be no reduction in the number of children that are transported to and from school or school events on large school buses. Safe Kids supports this new, slightly modified recommendation for many of the reason it deferred to NHTSA historically on the matter. The recommendation considers real world school transportation needs, ultimate risk, is practical in implementation and allows flexibility as to how the recommendation is implemented in communities with different needs, budgets and school populations.

Safe Kids notes that the Federal Aviation Administration (FAA) found itself in a similar quandary when deciding whether to require children under age 2 (otherwise known as lap children) to be restrained in a car seat while traveling on planes, thus preventing them from flying on a parent's lap and, therefore, requiring the parent to purchase an extra, possibly expensive airline ticket. Faced with the same possible negative consequences of diverting travelers to a more dangerous mode of transportation to save costs, and among other reasons, the

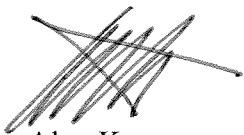
FAA decided not to require child safety seats during air travel. It appears that NHTSA has crafted a similar real world recommendation.

III. Other Safety Measures

Safe Kids urges NHTSA to explore the use of other existing, new technologies and safety measures currently recognized and found in large trucks and passenger motor vehicles. Those measures, such as crash avoidance strategies and electronic stability control, used with existing and required anti-lock brake systems on buses, might serve to reduce the severity or even prevent injury producing crashes all together. Benefits realized from these advances in passenger cars and trucks may also prove advantageous when applied to large school buses.

Thank you for this opportunity to comment on such a vital proposal. Please contact us if you need further information.

Sincerely,



Alan Korn
Director of Public Policy & General Counsel
(202) 662-4463
akorn@safekids.org



Lorrie Walker
Training Manager & Technical Advisor
(202) 680-8605
lwalker@safekids.org