



April 12, 2021

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 2020–0215**  
**Agency Information Collection Activities: Renewal of an Approved Information Collection Request; Comment Request; Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery**  
**Written Comment from the National School Transportation Association to the Federal Motor Carrier Safety Administration (FMCSA)**

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer comments to the Federal Motor Carrier Safety Administration (FMCSA) Information Collection Request for comments on the Agency Information Collection Request on Qualitative Feedback on Agency Service Delivery, as published in Volume 86, Number 28, of the Federal Register on February 12, 2021.

**About National School Transportation Association**

NSTA is the leading resource for school bus transportation solutions and the voice for private contractors for over 55 years. We are a membership organization for school bus contract-operators engaged primarily in transporting students to and from school and school-related activities. Members range from small family businesses serving one school district, to large corporations operating tens of thousands of buses across multiple states. Regardless of size, our operators are staunchly committed to the safe and efficient transportation of our nation’s school children. Private school bus contractors account for 38 percent of the nation’s pupil transportation services and employ more than 250,000 individuals as bus drivers, mechanics, maintenance workers, dispatch, and office workers.

School transportation represents the largest form of mass transportation in the United States, as school buses outnumber other forms of public transportation vehicles almost 3.5 to 1. School buses are the transportation mode of choice by about a third of school-aged kids, who take a collective total about 52 million trips a day. Other forms of mass transportation have 34 million daily boardings, and transport only 10 percent of American commuters each day, including children who ride the city transit bus to class rather than the yellow bus.

Daily, almost 26 million K-12 students are transported by an estimated 480,000 yellow school buses. Every day, the lives of these children are entrusted to certified school transportation professionals, who have received special training and have the experience to ensure the safe transport of students. School buses remain the safest way to transport a child to-and-from school, and school-related activities, as they are the most regulated form of transportation. In fact, school buses are far safer for a student than a child walking, riding a bike, or being transported in a car with a fellow student, or parent, to school. According to National Highway Traffic Safety Administration (NHTSA) statistics, students are 70 times more likely to arrive at school safely when riding in a yellow bus.

As you are aware, most school bus contractors operate under U.S. Department of Transportation, Federal Motor Carrier Safety Administration, as they are “for hire” motor carriers. As such, NSTA feels that this information collection request can be an important piece in cultivating and enhancing the relationship between the Agency and its stakeholders. NSTA understands that this FMCSA proposal attempts to strengthen the relationship between the Agency and the regulated community, yet we also believe that regular interaction between the parties is vital. Therefore, it remains critically important that FMCSA continues to work in concert with the regulated community in order to successfully meet the challenges that have been thrust upon the nation, given the outbreak of the Covid-19 pandemic last year. We suggest that FMCSA perhaps consider quarterly stakeholder meetings, as a step to bridge the gap between issuing of rulemaking and adoption of final rules, or simply as a venue to share information between parties.

As with many sectors of the economy, the COVID-19 health crisis has had devastating effects on the student transportation system. In the short term, NSTA is concerned about addressing a number of issues under the purview of FMCSA, including, but not limited to: Possible School Bus Driver Shortage (School Bus Only CDL), CDL Skills Test Delays, Launching of Entry Level Driving Training (ELDT) registry, and Automated Driving Systems (ADS).

We appreciate the opportunity to offer comments on the FMCSA–2020–0215, and look forward to continuing to work with FMCSA on this matter. If further clarification is required, please do not hesitate to contact me at 703-684-3200 x 700, or via email at [cmacysyn@yellowbuses.org](mailto:cmacysyn@yellowbuses.org).

Sincerely,



Curt Macysyn  
Executive Director  
National School Transportation Association