

July 29, 2025

Docket Operations  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
West Building, Ground Floor  
Washington, DC 20590-0001

**RE: [Docket No. FMCSA–2025–0115] RIN 2126-AC89**  
**Clarifying Requirements in Daily Vehicle Inspection Report**

Dear Sir or Madam:

National School Transportation Association (NSTA) is pleased to offer comments to the Federal Motor Carrier Safety Administration (FMCSA) on its Clarifying Requirements in Daily Vehicle Inspection Report, as published in Volume 90 Number 103, of the Federal Register on May 30, 2025.

**About The National School Transportation Association**

NSTA has been the leading resource for school transportation solutions and the voice for private school bus operators for over 60 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 to large multi-state operators. Private school bus contractors account for 38 percent of the nation's pupil transportation services and employ more than 250,000 individuals such as bus drivers, mechanics, maintenance workers, dispatchers, and administrative workers. School transportation represents the largest form of mass transportation in the United States, and daily, approximately 25 million K-12 students are transported by an estimated 480,000 yellow school buses.

**NSTA Acknowledges FMCSA's Effort to Clarify Reporting Standards**

NSTA supports FMCSA's effort to clarify that Daily Vehicle Inspection Reports (DVIRs) may be completed electronically, as outlined in this Notice of Proposed Rulemaking. Encouraging the use of electronic reporting can provide motor carriers and drivers with a more efficient, cost-effective option for meeting inspection requirements.

However, NSTA believes it is essential that FMCSA continue to allow paper-based DVIRs as a compliance alternative. As such, NSTA would not be supportive of mandated electronic reporting that eliminates paper filings, as school bus operators should be able to retain the flexibility to choose the format that best suits their operational and technological capabilities.

With many of the school bus carriers being small family owned and operated businesses, the monetary impact of the functional/cross-functional technologies required to comply with the proposed rulemaking will likely create unnecessary hardship. This point is supported by the current federal and state required bus inspections that include the verification of DVIR recording, reporting, and appropriate response by each school bus transportation provider. This mechanism can be leveraged to correct or escalate unresolved matters by individual organizations and be reflected on their SMS scoring, available for public view.

Furthermore, we would like to point out that many school bus operators are intrastate only carriers, travelling within a 30-mile radius and returning to a “base” location two times per day. This serves as a secondary mitigant to road failures that are more common amongst long haul truckers.

### **Summary and Conclusion**

NSTA recognizes the effort behind this proposal and supports FMCSA in authorizing the use of electronic reporting. However, NSTA asks that the Agency clarifies that it continues to permit paper-based DVIR filings, as NSTA does not support a mandate requiring only electronic reporting.

NSTA appreciates the opportunity to offer comments on FMCSA–2021–0050, RIN 2126–AC39, and we look forward to a continued dialogue with the Agency in monitoring the results of this proposal.

If you have any questions about our position, or need further clarification on our comments is required, please do not hesitate to contact me via email at [cmacysyn@yellowbuses.org](mailto:cmacysyn@yellowbuses.org), or via telephone at 703-684-3200, ext. 700

Sincerely,



Curt Macysyn  
Executive Director  
National School Transportation Association