



December 16, 2024

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 DOT-OST-2022-0027] RIN 2105-AF01
Comments in Support of Electronic Signatures, Forms and Storage for Drug and Alcohol
Testing Records**

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer comments to the Department of Transportation Comments in Support of Electronic Signatures, Forms and Storage for Drug and Alcohol Testing Records, as published in Volume 89 Number 199, of the Federal Register on October 15, 2024.

About 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 as bus drivers, mechanics, maintenance workers, dispatch, and office 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 Supports Expanding the Optional use of Electronic Forms and Recordkeeping

NSTA believes the option to expand the use of electronic signatures and forms in workplace drug and alcohol testing will be positive for the school transportation industry. The option to transition to electronic signatures and forms will streamline administrative processes for DOT-regulated employers. For operators opting to digitize this process, it would reduce the need for physical storage space and eliminate delays caused by paper-based processes, such as mailing or hand-delivering documents. This increased efficiency translates directly into cost savings for employers, allowing them to allocate resources more effectively.

Additionally, the proposal prioritizes maintaining the integrity and confidentiality of drug and alcohol testing procedures through additional security measures that come with electronic signatures and recording keeping. Modern electronic systems can implement robust security measures, including encryption, access controls, and audit trails, which enhance data protection compared to traditional paper-based methods. Lastly, NSTA appreciates the flexibility of the proposed rule allowing operators to continue to use physical signatures and forms if that is their preferred method of recordkeeping.

National School Transportation Association

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NSTA sincerely appreciates the opportunity to offer comments on the Docket DOT-OST-2022-0027; RIN 2105-AF01 and looks forward to further engagement with DOT on this important matter. If you have any questions, or further clarification is required, please do not hesitate to contact me at 703-684-3200 ext. 700, or via email at cmacysyn@yellowbuses.org.

Yours truly,



Curt Macysyn
Executive Director
National School Transportation Association