

January 22, 2026

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

**RE: [Docket No. FMCSA-2024-0255]  
Agency Information Collection Activities; Approval of a New Information Collection Request:  
Study of Warning Devices for Stopped Commercial Motor Vehicles**

Dear Sir or Madam:

National School Transportation Association (NSTA) is pleased to offer comments to the Federal Motor Carrier Safety Administration (FMCSA) on its Agency Information Collection Activities; Approval of a New Information Collection Request: Study of Warning Devices for Stopped Commercial Motor Vehicles, as published in Volume 90 Number 244, of the Federal Register on December 23, 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 appreciates FMCSA's effort to advance research through the proposed Information Collection Request (ICR). We recognize the value of collecting empirical data to better understand how warning devices may influence driver perception, behavior, and crash-relevant outcomes in the presence of a parked or disabled commercial motor vehicle (CMV). We highlight that school buses are unique from other commercial motor vehicles in that our drivers must vigilantly safeguard our most precious cargo – the students we transport. Even the process of deploying reflective triangles can reflect competing priorities for our drivers. Simply put, what may be logical in the context of motor truck, may not yield a desired outcome when applied in the student transportation realm.

Therefore, as the findings of this study may inform future rulemaking, policy guidance, or exemption determinations related to warning devices, NSTA emphasizes the importance of accurately distinguishing school bus operations from other CMV operations. Without clear differentiation, there is a risk that the study's conclusions could be overly broad, creating unintended regulatory or operational impediments for pupil transportation providers. Clarifying these distinctions will help ensure that the study's results are interpreted within the appropriate student transportation operational context and do

not spawn a regulatory framework that sweeps in student transportation but is not aligned with the best interest of the children we transport.

**Summary and Conclusion**

NSTA appreciates FMCSA's efforts to advance safety research and supports the Agency's data-driven approach. NSTA urges FMCSA to clearly define the scope of the study, specifically when understanding how and when standards are applied when addressing school bus transportation. Clarification and definition will help ensure the results are interpreted and applied appropriately, especially when requirements dictate that school bus drivers leave their students unattended.

NSTA appreciates the opportunity to offer comments on FMCSA-2024-0255, and we look forward to a continued dialogue with the Agency in monitoring the results.

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 [info@yellowbuses.org](mailto:info@yellowbuses.org), or via telephone at 703-684-3200, ext. 700

Sincerely,



Curt Macysyn  
Executive Director  
National School Transportation Association