

National Transportation Safety Board

Washington, DC 20594

October 26, 2015

Mr. Charlie Hood
Executive Director
School Bus Manufacturers Technical
Council
8205 Bristol Ct.
Tallahassee, FL 32311
execdir@nasdpts.org

Dear Mr. Hood:

Thank you for the July 31, 2015, letter to the National Transportation Safety Board, signed by Mr. Ken Whisnant, Chairman, School Bus Manufacturers Technical Council (SBMTC), regarding Safety Recommendation H-13-37. We issued this recommendation to the SBMTC on September 9, 2013, as a result of our investigation of a February 16, 2012, school bus and truck collision at an intersection near Chesterfield, New Jersey.

H-13-37

Develop a recommended practice for establishing and safeguarding the structural integrity of the entire school bus seating and restraint system, including the seat pan attachment to the seat frame, in severe crashes—in particular, those involving lateral impacts with vehicles of large mass.

We appreciate your SBMTC members' efforts to find the best way of implementing this recommendation. However, we are disappointed by your decision to petition the National Highway Traffic Safety Administration (NHTSA) to study the integrity of school bus seating system designs, including the newly required self-latching seat designs. We understand that you believe that a solution offered by NHTSA will ensure design consistency among all manufacturers, but we believe that you have sufficient influence among the majority of school bus manufacturers to address this important safety concern more efficiently. Nevertheless, your action will constitute an acceptable alternate means of accomplishing this recommendation. Accordingly, pending your notifying us of NHTSA's decision regarding your petition and the subsequent issuance of guidance or a standard to address the recommended action, Safety Recommendation H-13-37 is classified "Open—Acceptable Alternate Response."

Please submit future updates electronically at <u>correspondence@ntsb.gov</u> regarding your progress in addressing Safety Recommendation H-13-37, and do not submit both an electronic and a hard copy of the same response.

We appreciate your continued efforts to improve school bus safety.

Sincerely,

cc: Mr. Ken Whisnant
Chairman
School Bus Manufacturers Technical
Council
kenneth.whisnant@daimler.com

Mr. Leon Langley
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of Pupil Transportation Services
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