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August 26, 2010

Honorable Christopher A. Hart, Vice Chairman
National Transportation Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Re: August 5, 2010 school bus accident near Gray Summit, MO.

**From: Clarence Ditlow, Center for Auto Safety
Arthur Yeager, National Coalition for School Bus Safety**

Dear Mr. Hart:

Those concerned about the safety of school buses have historically had difficulty in evaluating the magnitude of the problem because unlike most accident statistics available, state and national data reflects bus fatalities and injuries only when the vehicles are utilized for school activity and not when the vehicles are used for other purposes.

As a result since schools operate for just about half the days of each year most statistics do not include figures regarding bus accidents when they used for camp, church, social and athletic club activities. Often the very same buses driven by the very same drivers are involved but are not included under the designation "School Bus Accident Statistics." The effect is to portray school busing as a far safer enterprise than it is in fact.

A comprehensive study identified a much greater level of school bus related injuries to children than reported previously.¹ The Pediatricians determined that there were about 17,000 school bus, hospital treated injuries each year, double official government reports and consistent with time on the road for counted and uncounted accidents.

The NTSB has investigated and reported on many of these major accidents that were never included in official school bus accident data. Some examples:

29 Fatal near Martinez, CA. (NTSB-HAR-77-2) School choir on way to a concert.

3 Fatal near Tifton, GA (NTSB-HAR-79-2) Ypsilanti Boys Club Bus on trip to Florida.

2 Fatal near Luling, TX (NTB-HAR-81-4) East Side Church of Christ Church choir on the way to sing.

9 fatal near Devers, TX (NTSB-HAR-84-06) Activity Bus Collision on way to visit a church.

¹ "School Bus-Related Injuries Among Children and Teenagers in the United States, 2001-2003" PEDIATRICS, Vol. 118 No. 5, November 2006, pp. 1978-1984.

26 fatal near Carrollton, KY (NTSB-HAR-89-01) Pickup Truck, Activity Bus Head on Collision and Fire returning from Amusement Park visit.

6 Fatal near Palm Springs, CA (NTSB-HAR-93-01) Girl scout trip.

In these six accidents 75 occupants were killed and 177 injured, and although all occurred on school buses none were included in school bus accident data.

As you investigate the Gray Summit accident please look into whether the John F. Hodge High School band's trip to Six Flags is properly classified as occurring on a school bus.

On behalf of Clarence and myself,

Thank you for your consideration.

cc: Clarence Ditlow