

December 22, 2011

Docket Clerk
Dockets 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 ID Number FMCSA-97-2349

The National School Transportation Association appreciates the opportunity to comment on the Supplemental Notice of Proposed Rulemaking (SNPRM) related to the Unified Registration System and the proposals to improve the registration process for entities that register with FMCSA.

NSTA is a not-for-profit association of private businesses providing transportation services to public school districts and private schools across the country. Our members range from single bus owners to large multi-national corporations operating thousands of school buses in many states. Private carriers operate about one-third of the nation's school bus fleet.

As we noted in 2005 and again in 2007 in regard to the NPRM on the Unified Registration System, private school bus operators occupy a unique position among motor carriers. Many of their operations are exempt from regulation, but in other ways they are treated as commercial carriers. This makes use of the URS more complex for school bus companies than for other motor carriers. Therefore, NSTA is seeking clarification on the following items of the proposed registration form:

- 1) As we understand the rule, school bus operations (home-to-school-to-home routes) continue to be exempt. Therefore, a for-hire school bus contractor would register only if he or she provides charter transportation such as school activity trips; and would check the box on the proposed form in Sec. 17a for Charter and Special Operations. We would appreciate clarification from FMCSA that under the sections on the form that ask for the number of vehicles and the number of drivers that will be operating in the United States, the contractor need enter only the portion of his vehicles and drivers that are used in charter operations, and not the portion that are used in school bus operations.

- 2) Please clarify whether in question 36, Government Funding Status, government financial assistance includes a contract between a municipality and a school bus contractor for school transportation service, if such contract includes activity transportation.

For additional information on school bus operations we refer you to our comments of June 18, 2007 on the NPRM docket No. FMCSA-2007-27871.

Thank you for the opportunity to comment. For further information or clarification, please contact me at 800-560-1654.

Sincerely,

A handwritten signature in black ink, appearing to read "David F. Hobson". The signature is fluid and cursive, with a large initial "D" and "H".

David F. Hobson

Executive Director

National School Transportation Association