



California Bus Association

Promoting Professionalism, Safety & Integrity in the Motorcoach Industry

September 23, 2004

Federal Motor Carrier Safety Administration

Docket No. FMCSA-2004-18898 and FMCSA –1998-3639

My name is Mike Waters, and I am President of the California Bus Association, a trade association promoting professionalism, safety and integrity in the motorcoach industry.

In my 30 plus years of management experience in the motorcoach industry, and 4 years as President of this Association, I have experienced years of frustration being subject to numerous terminal inspections by various agencies, while the majority of my competitors have either never or rarely been inspected by DOT. Often times, my company has undergone, in some cases within the same month, inspections by California Highway Patrol (with the annual terminal inspection), DOT, AND by the Military Traffic Management Command (MTMC). When examining the differences in the criteria of these various inspections, by far, the CHP terminal inspection is the most stringent of all.

In California, as in some other states, many bus operators are school certified carriers. These carriers are referred to as either SCHOOL CERTIFIED (the yellow school bus) or S.P.A.B. CERTIFIED (School Pupil Activity Bus)- motorcoaches certified to perform school related activity trips, such as field trips or sports team trips. These carriers must undergo annual terminal and vehicle inspections by the CHP Motor Carrier Division. Included in this inspection is the employer/carriers drug and alcohol program. In most cases, **every** bus in the carrier's fleet is inspected and issued a new CVSA sticker upon satisfactory completion of the inspection.

In order to reduce what appears to be duplication of inspections, since the C.H.P. performs what easily constitutes a Level One inspection, this inspection record (of which the carrier receives a copy) could very easily be transmitted (possibly electronically), to FMCSA of the Satisfactory/ Conditional/ Unsatisfactory results of the inspection.

In order to free up manpower, these Satisfactory inspections should be given a PASS for an onsite inspection by FMCSA. in order to expand the scope of the carrier's who are not inspected and NEED to be inspected. This PASS and the continued exemption from Federal inspections in the future would be based on the continued SATISFACTORY inspection status of these carriers.



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If the goal of FMCSA is truly to protect the safety of the travelling public, methods such as this will enable an increase in the numbers of inspections the agency is able to perform. The results of this would help to meet the agency's goal of significantly reducing crashes, fatalities, and injuries involving, in this case buses, by broadening the field of motorcoach operators that can be inspected and monitored.

The public at large deserves to travel in safety, and this measure can increase that assurance of safety.

Sincerely,

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President, California Bus Association
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