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Question 1: If a school bus provider wants to participate in the “Books on the Bus” program how shall the books be secured in the bus?

Discussion: The Federal Motor Vehicle Safety Standards (FMVSS) 571.222 refer to the “capsule” that protects a child as compartmentalization. FMVSS 571.222 also dictates how the padding must be in place to help pad the surfaces of the seat to protect an occupant during a crash. The Division of State Patrol (DSP) understands the value of this program to assist in literacy and decrease disruption during school bus transportation. However, DSP has to consider the safety implications associated with placing books in the seatback forward of occupants. School bus seatbacks are designed to reduce the forces during an occupant impact and having the books in the back of the seatback will change these crash dynamics.

(TR300.59(1): There shall be a minimum space of 24 inches between the forward surface of a seat back and the rear surface of the seat or barrier ahead measured across the seat cushion without depressing any surface.

Guidance: The books may be kept in “satchels” or “bags” which are secured to seats. The 24 inch area between the forward surface of the seat back and the rear surface of the seat barrier cannot be reduced. DSP recommends to place the satchel or bag in the middle of the forward surface of the seat back. In most cases this will reduce the capacity of that seat from 3 to 2. Another recommendation is to secure books in the front of the bus in the driver’s area and an occupant of the bus can take a book when entering the bus and return the book when exiting. One last option is to secure the books in empty seats in front of the bus.

Question 2: If a school bus is not constructed to accommodate the “STOP ON FLASHING RED” lettering, how shall this lettering be applied?

TR300.61 (9m)

On or after August 1, 2016, each school bus equipped with an eight light warning system shall have contrasting black lettering indicating the word “STOP” centered on the rear emergency door panel in 8 X 1 inch minimum letters with the words “ON FLASHING RED” directly below and centered in 4 ½ X ½ inch minimum letters. When a rear emergency door is not present this lettering shall be placed in a visible location on the rear of the school bus body as close to the centerline as practicable. This lettering may be reflective material or have a reflective background.

Discussion: It is DSP’s understanding the language in the proposed rule would accommodate the majority of the buses currently operating in WI. As the enforcement agency, DSP has the ability to implement a tolerance to this rule on a case-by-case basis. This rear lettering was included into this revision at the request of industry going back to 2010. When DSP wrote the language school bus body manufacturers were contacted and this was the size that was recommended for incorporation into the rule. DSP intended to create a message and location for uniformity purposes. This requirement only applies to school buses equipped with an eight light warning system, but may be applied if manufactured prior to 01/01/2005 since these school buses are not required to be equipped with the eight light warning system.

Guidance: If the lettering will not fit on the rear of the school bus as described in TR300.61(9m) the lettering may be sized to fit but must be as large as practicable but may not be less than 4 x ½ for “STOP” and 2 x ¼ “ON FLASHING RED.” With the understanding this only applies if the lettering will not fit due to how the bus is constructed. If the bus has a rear engine with vented areas preventing lettering to be applied to flat metal the same guidance shall be followed.

If the rear door is all glass with no separation between the top and bottom windows the lettering may be applied directly to the glass. The lettering size must meet TR300.61(9m) with a yellow background or border with black lettering. This lettering shall be centered in the middle portion of the glass.

Sincerely,

Lieutenant Karl L. Mittelstadt
Motor Carrier Section – Wisconsin State Patrol