

Summary of Stakeholder Comments from the Motorcoach Regional Roundtables

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INTRODUCTION

After a number of bus crashes and fatalities in 2011, FMCSA convened a series of motorcoach safety roundtables across the country to engage key stakeholders in a discussion on the passenger carrier safety challenges and a brainstorming on strategies to address those challenges.

Representatives from law enforcement, safety advocates, motorcoach drivers, industry representatives, passenger carriers, safety consultants, and community groups attended sessions in four cities: Dallas, Texas; New York, New York; Columbus, Ohio; and Anaheim, California.

This document summarizes the comments and suggestions made by stakeholders at these meetings. Some comments reflect the views only of an individual; other views were shared by multiple stakeholders. FMCSA facilitated the discussions. **These comments, however, are not endorsed by FMCSA and do not necessarily represent the Agency's views or positions.**

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Table 1: Major Challenges to Regional Motorcoach Safety Identified by the Roundtable Participants

CHALLENGES	LOCATIONS			
	Dallas, TX	New York City, NY	Columbus, OH	Anaheim, CA
Issues related to consumer education/public awareness	X	X	X	X
Drivers (training, fatigue, multiple jobs)	X	X	X	X
Intentional disregard of regulations	X			
Law enforcement (training, consistency, inspection, etc.)	X		X	
Establishing higher standards for new entrants		X		X
Safety and legality are not always the same thing		X		
Hours of service issues			X	
Managing the message/media/getting the message out to the consumer			X	
Uniformity: standards differ among all states (regulations, enforcement, etc.)				X
Sharing best practices (among industry, enforcement, consumers, and all stakeholders)				X

* This table includes the top four challenges identified by each roundtable during Strategy Breakout Sessions where stakeholders reduced the challenges they identified in the Challenge Breakout Group Discussions to “major challenges.” Some locations identified similar challenges, as the table shows with rows that have multiples X’s.

Table 2: Strategies to Address Major Challenges to Regional Motorcoach Safety Identified by the Roundtable Participants

STRATEGIES	CHALLENGES									
	Issues related to consumer education/public awareness	Drivers (training, fatigue, multiple jobs)	Law enforcement (training, consistency, inspection, etc.)	Intentional disregard of regulations	Establishing higher standards for new entrants	Safety and legality are not always the same thing	Hours of service issues	Managing the message/media	Uniformity	Sharing best practices
Advertising safety information in local newspapers to targeted groups	1,2									4
Friendlier website (FMCSA, industry, Triple A)	1							3		
Sales team training is important at the company level				1						
Higher penalties for drivers and companies				1						
Develop standardized, hands-on training and certification at federal level to perform specific motorcoach inspections, etc.			1,3						4	
Uniform enforcement of practices and appeals process			1,3							
Consistent training across board for all sizes of carriers		1,3,4								
Make CSA score or other rating more consumer friendly and simple	2,4									
Welcome video required at the beginning of each bus trip with safety information	2									
Sleep deprivation education and awareness		2					3			
Nationally approved driver pools to provide relief drivers		2							4	
Operators required to pass a mandatory training course in an accredited program					2,4					
Regulated industry/economic regulations such as under the ICC					2,4				4	

TX - 1 ; NYC - 2 ; OH - 3 ; CA - 4

National database		2				2				4
Outreach/education		2					3	3		4
New technology with monitoring (EOBRs)						2				
Properly manage trips between midnight and 6 am							3			
Price is not the deciding factor in the safety of a bus	3									
Coalition Building (consumer advocate groups, government and industry, etc.)								3		4
Analyze and compare state laws and regulations									4	

TX - 1 ; NYC - 2 ; OH - 3 ; CA - 4

* This table displays the two key strategies identified by members of the roundtable for each of the major challenges. Although stakeholders discussed many strategies to meet major challenges, the roundtable process required choosing each group's top two. As with the major challenges table, some of the locations identified similar strategies, and the table shows these overlaps.

This document summarizes the comments and suggestions made by stakeholders at four motorcoach safety roundtable meetings across the country. The following comments, however, are not endorsed by FMCSA and do not necessarily represent the Agency’s views or positions.

Section 1. Comments Directly Related to FMCSA Regulations

1.1. Comments related to HOS and fatigue

1.1.1. Hours (driving, on-duty)

Stakeholders made comments concerning revising the hours of service rules, driver incentives and awareness, public awareness, and consistency in applying the rules. A comment was made that FMCSA should revisit hours of service rules. There was an observation that following the rules does not guarantee elimination of driver fatigue, because drivers simply may not get enough rest. Stakeholders suggested looking at Canada’s HOS regimen as a model and at how other countries address driver fatigue. There was an observation that running legally is not necessarily running safely. For example, said stakeholders, an “odd sleeping pattern,” or “odd tour schedule” may make a driver unsafe even when observing the current requirements. Stakeholders made the following suggestions for revising the HOS rules to enhance safe driving: ban overnight travel; reduce the “daily average work day;” clarify the difference between “off duty” and “on duty, not driving”; require more than 8 hours of rest time; do not count fatigue breaks against duty or driving hours; increase fines on drivers who do not comply; and require two drivers for overnight trips. Stakeholders also suggested the following changes that were beyond FMCSA’s authority: require paid overtime for working in excess of 40 hours; require that contracts include breaks; and level the playing field so that drivers are not subject to the whims of charter carrier customers.

Stakeholders noted many issues concerning driver incentives and awareness. One comment was that the hourly pay structure puts considerable economic pressure on drivers to go out. It was suggested that if a driver is “compensated in any way,” he or she should be considered “on duty.” Other comments were that drivers in denial of fatigue push themselves excessively and that many drivers were unaware of the HOS rules and did not know where to find the information. (Finding information on the rules also was noted as a problem for companies.) Concerning driver monitoring and enforcement, there were questions concerning how to deal with a driver who falsifies his or her log, and whether to fire a driver who goes over the allotted hours. It was said that because some drivers work for multiple companies, it was difficult to track hours. A similar observation was that non-bus related driver activities were not recorded. Drivers, said one comment, should be held more accountable, and driving while fatigued should be equated with driving under the influence.

Stakeholders said that because the public did not realize the danger of driver fatigue, there should be an awareness campaign on the safety risks posed by nighttime driving. Finally, stakeholders discussed the application of the HOS rules, saying there must be consistency in how the rules apply to large and small operators, a way to ensure accuracy in checking HOS, and proper

management of trips between midnight and 6:00 am. It was noted that some transportation operations were exempt from federal law.

1.1.2. Night driving

Stakeholders observed that there should be stricter rules for overnight driving. Another comment was that rules should permit drivers to pull over when they are tired without repercussions. It was said that pulling over for being tired should be the same as pulling over for mechanical difficulties, and that a driver should have the option of recording such time as off duty. A suggestion was made to study interrupted sleep cycles and identify drivers who were better nighttime drivers. Other suggestions were to keep drivers on a set night or day schedule, and to ride along with drivers.

1.1.3. Multiple jobs

Stakeholders made observations concerning multiple jobs. One was the problem of a lack of communication between carriers regarding drivers who work for multiple operators. For example, it was noted that a person might legally drive a limousine for several hours after having driven a bus all day, and that a carrier might not know a driver is working a second job. The following were among the remedial suggestions made: to create a national database of driver information tied to a pre-employment screening program; to integrate existing state, local, and federal databases and programs such as CDLIS, drug and alcohol reports, and the National Registry of Certified Medical Examiners (NRCME); and to permit reporting between companies regarding HOS for drivers who hold multiple jobs, including sharing of information on drivers placed out of service. Other suggestions to help carriers find information concerning a driver's status were to permit owner/operator access to data systems, develop a standard data dictionary, and write a memorandum of understanding on access to state information.

1.1.4. Other HOS issues (consecutive vs. cumulative hours, teams, sleeper berths, EOBRs, breaks, etc.)

Stakeholders said HOS rules were too complex and that neither passengers nor law enforcement understood those rules. One comment was for new federal and state legislation on motorcoach safety issues. There were endorsements of different technologies as useful in monitoring HOS compliance and ensuring company and driver accountability. These included electronic on-board recorders (EOBRs), a software program to show carriers when a driver began HOS and the trip limitation, and a card system where a driver could swipe in and out. One comment was that HOS monitoring – whether by log or EOBR – should be a tool of support rather than a way of confrontation. Another comment was to link a driver's license, buses, and electronic logs to monitor drivers. Stakeholders said company and regulatory policies should permit both team drivers and changing out drivers for cross-country trips.

1.2. Comments on the Compliance, Safety, Accountability Program (CSA) ratings

1.2.1. Comments on the rating system

Observing that CSA was an improvement over the Safety and Fitness Electronic Records system (SAFER), stakeholder comments on CSA included improving definitions, differentiating ratings for motorcoach and trucking companies, and tying CSA and safety ratings. There were

comments on the lack of accurate bus safety ratings, that CSA should better reflect truly unsafe violations, and that the government must generate the ratings, because industry-generated ratings would not be trustworthy. It was also observed that brokers should be accountable for adhering to ratings and that there should be incentives for them to sell A-rated tickets.

Stakeholders opined that in a CSA rating, driving while fatigued and failing to update logs should not be weighted equally, nor should missing information on a log have the same consequence as failure to have a log. One comment was that safety initiatives should be a company responsibility and that carriers should guarantee the safety rating. Another was that bus safety regulation could be like regulating household goods transportation in that the government should require tariffs for any bus carrier with a bad safety record.

1.2.2. Comments on the understandability of the CSA information

Stakeholders opined that the CSA score or other safety ratings should be simpler and more consumer friendly. Other observations were that bus companies might not post safety ratings on company websites, that press releases concerning safety get a good response, and that people seem to care more about price than safety. Stakeholders said that because CSA scores confused customers, there was a need for education on compliance and safety ratings.

1.3. Comments on qualification, education, and training requirements for drivers

Stakeholders said that there were very low standards for hiring drivers and that getting a CDL should be more difficult than it is now. One comment said there should be no grandfathering of drivers into the CDL program, and another said that the standards for passenger drivers should be higher than standards for property drivers. A problem noted was the large number of drivers who were not proficient in English, and a proposed solution was to make the CDL test an English-only test. Stakeholders said there should be nationally approved driver pools to provide relief drivers. One observation was that there should be psychological testing to ensure potential drivers can handle the stress of passenger operations. Another suggestion to qualify bus drivers was to conduct standardized background checks such as the pre-employment screening program (PSP), including checking for drug, alcohol, and road offenses. Stakeholders said that to maintain their CDLs, older drivers should be tested periodically for sensory proficiency, such as hearing acuity and acceptable peripheral vision. Stakeholders suggested incentives programs for bus drivers such as awarding insignia to indicate crash-free miles traveled and cash awards for safe drivers.

There were many comments and suggestions concerning driver education and training. According to stakeholders, the following are among the many challenges to achieving appropriate driver training: cost; the availability of training resources; inconsistency and disparity in driver education and training; the lack of national standards; and the lack of driver awareness concerning the effects of fatigue and driver exposure to liability.

To improve driver education and training, stakeholders made suggestions concerning strategies to fund training, develop and improve curricula, establish training frequency, and set standards for training providers. Regarding funding, stakeholders suggested having drivers and companies share the cost, allowing companies to decide whether to subsidize the cost of training,

establishing a federal grants program for driver education, and working with the Transportation Safety Institute to reduce training costs. There was also a suggestion that insurance companies should offer discounts for training. To develop and improve curricula for bus drivers, stakeholders suggested the following: having FMCSA set national standards or a model for driver training; having a minimum curriculum for bus drivers; requiring training for all sizes and types of carriers; and requiring bus safety, equipment (e.g., operating wheelchair lifts), compliance, skills, and scenario-based (e.g., rural vs. urban driving) training. Stakeholders noted a need for education on recognizing fatigue and sleep disorders, and on strategies for treating these conditions (e.g., the value of getting sufficient rest). One comment said part of bus driver training should be understanding road signs and that signs directed at trucks also may apply to buses. Comments also suggested offering “best practices” training in a number of areas related to bus safety and driver awareness. Regarding training frequency, stakeholders suggested minimum entry level training, regular refresher training for bus drivers, a continuing education program, and driver recertification at specified intervals. Stakeholders also said there should be periodic, standardized testing, and that driver tests should reflect the required curricula. There was a comment that drivers involved in crashes needed specialized intervention.

Stakeholders also offered suggestions for offering training, including the following: simulator, web-based, and classroom training; requiring equipment manufacturers to provide training DVDs; and collaborating with FMCSA, CMV driving schools, and other organizations to develop curricula and share best practices. A comment was that FMCSA’s website could be more user friendly for people seeking training opportunities.

1.4. Comments of new entrant process for motorcoach carriers

1.4.1. Comments on timing of approval

Several stakeholder groups discussed the new entrant process for motorcoach carriers. There was consensus that the current barriers to entry were too low, and stakeholder groups offered several ideas on how to raise the bar for entry into the industry. Several groups expressed the idea that new operators must demonstrate baseline knowledge of the industry before they are allowed to operate, including the ability to operate a motorcoach company safely, and to follow the regulations. The licensing bureau should also give out an operator’s handbook when a new operator applies for a permit. Stakeholders said that increasing what a company must know before it begins operation should decrease the number of initial audit failures. Some suggested that new entrants should have to submit a business plan as a condition of receiving a DOT number.

There was also consensus that new entrant audits should be conducted much sooner to correct bad operating habits before such habits become part of the company’s culture. Stakeholders felt that if a new entrant fails a safety audit, there should be better follow-up from the enforcement agency to ensure that safety concerns are addressed in a timely manner. Some suggested that motorcoach carriers be granted only probationary or temporary operating authority until they pass an initial safety audit. Some stakeholders also supported the idea of requiring motorcoach carrier owners to know English.

One stakeholder group outlined a graduated entrant process through which the carrier would take courses on basic knowledge of the industry (e.g. learning safety standards), hiring drivers, the hours of service regulations, and the ramifications of non-compliance. Stakeholders suggested that as conditions of receiving provisional operating authority, new entrants be required to pass an entrance exam offered by a state or federal licensing authority, show proof of financial ability to operate the business, show proof of the ability to maintain buses in good working order, and show proof of insurance. During the new entrant's first year, the carrier would be subject to terminal inspections every 90 days. The new carrier would then be granted permanent operating authority after one year or four satisfactory inspections.

Stakeholders also said that existing motorcoach carriers should be required to participate in continuing education to retain their operating permits, and to show evidence of completing continuing education credits during audits or compliance reviews. Stakeholders also expressed interest in expanding the Commercial Industry Education Program (CIEP) nationwide. (The CIEP is a continuing education program offered by the California Highway Patrol that provides safety awareness training to commercial vehicle operators.)

1.4.2. Comments on identifying chameleon carriers

Stakeholders identified “chameleon” or “reincarnated” carriers as a significant issue within the motorcoach carrier industry. If a carrier is shut down for violations, the owners often will open a business under a new name and continue operating in the same manner. Stakeholders suggested that FMCSA generate a list of offenders to identify the operators that have violated the rules. If states or FMCSA required a new entrant exam, the owner or principal in the business should take that exam and should have to provide identification and a thumb print to make it easier to identify carrier owners attempting to open multiple businesses. It was suggested that a requirement for carrier management to have industry education before entering the industry and obtaining a DOT number may reduce the number of chameleon carriers, because these carriers would understand how to operate safely. Requiring carriers to participate in regional training or continuing education programs (such as those offered by the Bus Industry Safety Council or American Bus Association) by creating a new CSA 2010 category for participation, for example, may also reduce the number of chameleon carriers. Stakeholders said that requiring managers to provide additional employee training could help create a culture of safety in all companies.

Stakeholders suggested that useful strategies for identifying more chameleon carriers were promoting better, more even enforcement and asking other bus companies to help identify chameleon carriers operating in their areas or along the same routes. FMCSA could also set up a hotline to allow anonymous reporting of chameleon carriers and other bad actors. Some stakeholders also suggested regulating the industry more like the Interstate Commerce Commission had. Stakeholders also said carriers should take more responsibility for properly promoting and pricing their own services, which may make it more apparent which carriers are not complying with regulations.

1.5. Comments on medical qualification process

Several stakeholders recommended that the medical qualification standards be modified to include screening for sleep apnea. They suggested that medical professionals should screen drivers at the greatest risk for this and other disorders. Stakeholders also discussed how to track

whether a driver develops a disqualifying medical problem between required medical exams. Some stakeholders said that the medical exams should be required annually, and consistently performed by a doctor who is not a family physician and who is associated with the company. Stakeholders noted that because company doctors do not know the driver well, they would be less likely to falsify information. Another comment was that physicians need better training regarding new medical criteria and should be certified as qualified to perform the driver medical evaluation.

1.6. Other comments on motorcoach carrier qualifications

Stakeholders expressed interest in printing the FMCSR rulebook in languages other than English and Spanish to reach a wider audience of carriers. Stakeholders also discussed what methods would be most effective in identifying carriers that do not test their employees for drug use. Stakeholders also stated that both large and small carriers violate the regulations and that although people seem to want deregulation, motorcoach carriers need more regulation. Some said that companies of all sizes should be required to complete logs.

Section 2. Comments Related to Enforcement Issues

2.1. Comments on ability of inspectors to inspect motorcoaches (training of inspectors)

There was broad stakeholder support for educating law enforcement personnel on how to conduct motorcoach inspections. Stakeholders stated that there are no uniform standards for coach inspection training, which results in variations among local, state, and federal agencies and inspectors in conducting inspections and interpreting various laws and codes. Stakeholders said there should be a consistent law enforcement training program for use by all inspectors. Law enforcement personnel should be required to complete this curriculum for a motorcoach inspection certification, and should be trained on the following items: the differences between types of motorcoaches, the differences between trucks and motorcoaches, and the hours of service requirements for motorcoach drivers. Inspectors should have to complete additional training at specified intervals to remain certified, and the training should be updated periodically to include new technologies and vehicle configurations. Additionally, motorcoach inspectors should have a clearinghouse or library of information about motorcoaches as a common reference manual. Stakeholders said implementing these changes to inspector education should result in increased consistency in enforcement and interpretation of requirements.

2.2. Comments on inspections during trips

Stakeholders were mixed on their opinions of roadside inspections. Although most stakeholders agreed that roadside inspections were important as a method of getting unsafe operators off the road, participants also expressed several concerns. One concern was that roadside inspections could delay the driver and cause HOS violations if the driver needs to complete a route. Another concern was what to do with passengers during inspections, and whether the motorcoach carrier receives a negative image simply by having to submit to an inspection, even when the vehicle and driver pass the inspection. One suggested solution was for law enforcement officials to carry a list of vetted locations for motorcoach repairs and a list of vetted motorcoach carriers that can take passengers to their destinations if a bus is placed out of service. Stakeholders cautioned that

it may be more dangerous to strand a group of passengers in an area with no amenities than to allow the bus to continue operating with faulty parts. Some stakeholders suggested changing the language in SAFETEA-LU regarding in-transit inspections.

2.3. Comments on uniformity of inspection standards

Many stakeholders expressed concern with inequitable inspections across the motorcoach industry. Stakeholders contended that regular route motorcoaches are inspected much more frequently than charter motorcoaches, that larger carriers may be inspected more frequently than smaller carriers due to their large size and visibility, and that the practice of announced roadside inspections allows some carriers to skirt the inspection process. Stakeholders suggested that FMCSA increase inspections of rogue carriers (especially carriers with low CSA scores), and that the Agency take decisive action on violations. Noting that many inspections seem to occur after a crash, stakeholders said that compliance reviews should be more proactive to help prevent crashes.

Stakeholders discussed the difficulties presented by motorcoach inspections. Motorcoaches are more difficult to inspect than trucks, and the inspector must consider what to do with passengers during a roadside inspection. Stakeholders suggested shortening the duration of the inspection by using on-board diagnostics to check brakes and other equipment. They also suggested that inspections should be conducted more frequently, such as every six months.

To improve the inspection process, stakeholders recommended development of a standardized federal inspection process for adoption at the state and local levels. The inspection process they recommended would include development of a training curriculum and a required inspector certification process. They felt that, ideally, the certification process would present inspectors with enough material to inspect the variety of motorcoaches on the road. Additionally, as a strategy for decreasing the number of violations found during compliance reviews, stakeholders recommended better training for drivers, preparing them to conduct their own vehicle inspections. Stakeholders also recognized that funding might be a barrier to states conducting more frequent and thorough inspections.

2.4. Comments on language issues, enforcement, and licensing

Several stakeholders commented on the inconsistency of enforcement and general lack of follow-up on enforcement throughout the industry. Stakeholders called for consistent, logical, data-driven, and comprehensive rules, enforcement, and inspections. Some stakeholders opined that FMCSA did not need to create new regulations, but did need to improve enforcement of current regulations.

Stakeholders observed that FMCSA and state and local agencies could do many inspections, but that without follow up to ensure infractions are fixed, safety would not improve. Inspectors should also use inspections as an opportunity to teach carriers how to improve performance, and to identify additional training or industry participation opportunities for that carrier. Stakeholders also commented that FMCSA should not take 45 days to conduct investigations, because unsafe companies continue to operate during this period. To target inspections, enforcement officials should use data to identify companies most likely to be breaking the rules, and companies that have not been inspected in several years. Law enforcement should also hold companies liable for

driver infractions. A hotline should be established to anonymously report bad drivers. Some stakeholders cautioned that a carrier's competitors might abuse such a hotline.

Stakeholders commented on the language barrier between law enforcement and drivers, observing that there was no standard assessment for English proficiency, and that a determination of English proficiency depends on the inspector's perspective. The drivers for some carriers speak the same language as the passengers (i.e., Spanish, Chinese), but do not speak English. In some areas, a driver that learns enough English to be bilingual will leave the motorcoach industry and seek employment elsewhere.

2.5. Comments on penalties

There was broad consensus among stakeholders of a need for harsher penalties for non-compliant drivers and carriers. Suggestions for penalties included revoking a driver's license for five years after three log violations, and jail time or banning a company from the motorcoach transportation business for serious infractions. The stakeholders also called for FMCSA to focus its inspections on the bad actors in the industry.

2.6. Comments on data quality and accessibility

Stakeholders suggested that a database be created to contain all federal, state, and local regulations so that carriers can determine the regulations for motorcoaches throughout their routes. This database should also include information on driver histories to help monitor out-of-service drivers.

A few stakeholders commented on the appeals process for violations. They felt that there is a disparity in results for appealing to federal inspectors versus state and local inspectors. Stakeholders recommended use of Data Qs for all violations, and factoring state-level appeals into CSA ratings.

Section 2.7. Comments on state/local laws, enforcement

Stakeholders advocated for more consistency between federal, state, and local policies. They contended that current regulations are not sufficiently streamlined to work well at all levels of the government. Stakeholders also suggested regulations that are more consistent across the country regarding inspections. They argue that at present, there is no national standard regarding regulations, policies, or requirements for inspections. Stakeholders agreed that analysis is needed on which state laws differ the most from others and how best to resolve the differences. Stakeholders asserted that with increased communication between enforcement agencies, the problem could be solved swiftly and the safety of the motorcoach fleet in America would noticeably improve.

Section 3. Comments Related to Other Safety Issues

3.1. Seat belts

Stakeholders in New York said that although it is legal to drive a passenger motorcoach without seat belts, including seat belts for bus passengers would improve bus safety. In Anaheim, stakeholders also identified the lack of passenger seat belts in motorcoaches as a safety issue for

passengers. These same stakeholders stressed the importance of keeping buses compliant with the American Disabilities Act (ADA).

3.2. Motorcoach design

Stakeholders in the New York roundtable suggested standards for motorcoach design, asserting that vehicle safety required more regulation of the manufacturing and assembly process. Stakeholders in Columbus discussed whether the design of motorcoaches was safe for passengers.

3.3. Vehicle maintenance

In Columbus, the consensus was that to ensure safe vehicle conditions, there was a need for national standards (such bi-annual inspections).

Section 4. Comments on Public Access to Information/Public Outreach

4.1. Comments on accessibility of safety ratings

All roundtable locations discussed the accessibility of safety ratings. There was almost unanimous agreement that there should be better access to scoring, and that CSA ratings should be more consumer friendly. Stakeholders discussed instances of consumers taking buses when there was no way to know whether the bus company operations had high CSA ratings. This circumstance was especially evident in smaller operators and carriers.

Various stakeholders determined that the public not only needs an easy way to access safety information (e.g., a central website), but also needs a rating system that is easy to understand. By adopting successful but simple rating systems (such as the A, B, C health rankings of restaurants in New York City), customers could easily determine the safety of multiple carriers in a short search. Implementing a uniform rating system would keep scoring criteria consistent across the nation and help to identify unsafe carriers.

4.2. Comments on the accessibility of driver/carrier information to motorcoach carriers/brokers/insurance companies/groups chartering/public

Stakeholders in the various roundtable locations agreed that there were many impediments to having a valuable information flow between drivers, carriers, and the entities dealing with motorcoaches. They indentified one of the first barriers to overcome as meeting the information needs of consumers who lack easy access to internet or locations where information is available. They indentified the second barrier as appropriately educating drivers, carriers, and law enforcement officers. Some stakeholders asserted that many motorcoach drivers, carriers, and law enforcement officers around the county have not been properly educated on important aspects of motorcoach safety and operations. Another barrier they identified to safe passenger operations is making it apparent to consumers that safety, not price, is the most important aspect of investigating a motorcoach carrier. Stakeholders felt that the motorcoach industry should work with the media to address negative perceptions regarding bus safety.

Stakeholders determined that marketing motorcoach services and offerings was also an opportunity to educate the general public about the age and maintenance of motorcoach equipment, and to spread information on the safety records of carriers and their drivers (through scores and ratings).

4.3. Comments on the type of outreach needed to educate buyers of services to safety issues

4.3.1. What is needed

Stakeholders identified a range of issues on which motorcoach customers needed educating to help maximize passenger safety. Suggested issues for a customer education initiative included how to select a safe company, how to determine a driver's qualifications and training, what safety procedures a carrier should follow, and what constitutes proper carrier management. Stakeholders identified driver fatigue as one of the biggest safety issues passengers face, and noted that HOS compliance of a motorcoach carrier directly influences the driver's ability to operate safely. Stakeholders said that before they board a bus, passengers should be aware of a driver's HOS status. Stakeholders also noted that passengers should also be especially aware of the dangers of riding a motorcoach between 2:00 am and 6:00 am. One comment was that a consumer "bill of rights" might bring these issues forward.

Stakeholders suggested an outreach website with educational materials and resources as a logical step in enlightening an uninformed public about motorcoach safety. Such a site would inform customers of the type of risks they could endure when riding on a bus. Stakeholders said the site could explain safety laws, among other things. Stakeholders asserted that educating passengers on motorcoach and driver safety will have many advantages for bus customers, including making passenger travel safer.

4.3.2. Who should do it

Stakeholders discussed who should be responsible for informing the public of vital motorcoach information. Ideas for disseminating information included having different consumer groups working with the local media to spread information, having FMCSA improve its communication of safety and enforcement information to municipalities and large groups, and having a mandatory welcome video on buses (similar to those on an airplane). All of the stakeholders agreed that a collaborative partnership between venues, carriers, and law enforcement would be necessary to promote safety effectively.

4.3.3. How should it be done

Roundtable participants brainstormed ideas of how best to spread the information regarding motorcoach operations and safety to the public. Options explored included the following: having FMCSA buy advertising space on television, getting hotels to promote safe charter services, internet pop-up ads, a new website, locally targeted marketing, and using social media.

4.4. Comments on outreach to bus companies and drivers

4.4.1. What is needed

All roundtable locations recognized several outreach opportunities for bus companies and their drivers. Stakeholders noted that many carriers do not have operators and drivers who speak English as their first language, and that this fact creates an unsettling language barrier between drivers, their passengers, and sometimes enforcement and government officials. Stakeholders said that because the FMCSA site is English only, bus companies did not receive legally defensible translations of important regulations. Stakeholders found this lack of effective communication between government agencies and carriers disconcerting.

Stakeholders requested that carriers and their employees promote a “safety first” culture, including educating drivers in as many ways possible. For example, if an employee did not understand government regulations, there should be a requirement for the employer to hire someone to help provide education on regulatory compliance. Stakeholders said that making such practices standard around the country would help identify non-compliant companies.

4.4.2. How should it be done (media used)

Stakeholders suggested various ways to use media for outreach to motorcoach carriers and their drivers. One suggestion was for better coordination among federal, state, and local agencies. Stakeholders said FMCSA could put links to State DOT regulations on the Agency website in an easily accessible location. Another suggested outreach strategy was having carrier operators, enforcement officials, advocacy groups, destinations companies, and consumers attend association meetings to provide opportunities for a fair dialog among all affected parties. An idea for improving communication with motorcoach carrier customers was to have drivers, and operators take a Culture and Intensive English Program course or something similar to increase fluency in the English language.

5. Miscellaneous Comments

Several stakeholder groups discussed policies on whistleblowers, saying they were not clear how FMCSA used the information provided by whistleblowers. Stakeholders said that in general, drivers were unable to say “no” to their employers, and whistleblower protections needed strengthening.

Stakeholders expressed concern about how the motorcoach industry is perceived by the media. They recommended that FMCSA and the industry stop reacting to the public and improve communication of the overall safety of the industry.

Many stakeholder groups discussed the “unfriendly” nature of the FMCSA website and the general inability to navigate the site. They suggested making the site more user-friendly and making it easier to find forms and other useful tools. Stakeholders said the industry could use performance measures better, and FMCSA could collect and track performance indicators, including customer satisfaction, and provide performance oversight and monitoring. FMCSA could also provide better access to performance indicators and carriers could advertise and market their performance against the various measures.

Stakeholders suggested that the industry work more closely with insurance companies to educate insurers on technology and other safety equipment with the goal of reducing insurance premiums.

Some stakeholders said that motorcoaches should be regulated as stringently as hazardous materials carriers because motorcoach carriers directly affect the lives of many people. Other stakeholders expressed concerns about the level of government involvement in private business.

Several stakeholders stated that many road signs are confusing to motorcoach drivers. For example, instead of labeling a lane for “trucks” it should be labeled “wide vehicle.” Many motorcoach drivers do not know that signs for trucks usually apply to motorcoaches as well.