



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

July 11, 2017

The Honorable Robert L. Sumwalt, III
Acting Chairman
National Transportation Safety Board
490 L'Enfant Plaza East, SW
Washington, DC 20594

Dear Mr. Sumwalt:

This letter responds to the Safety Recommendations issued by the National Transportation Safety Board (NTSB) to the National Highway Traffic Safety Administration (NHTSA) concerning the September 26, 2014, multivehicle crash in Davis, Oklahoma. In this crash, a Peterbilt truck-tractor with a Great Dane semitrailer collided with a Champion Defender 32-passenger medium-size bus transporting 15 members of the North Central Texas College softball team. The crash resulted in the deaths of four passengers, who were fully or partially ejected from the bus. Our responses to the Safety Recommendations are discussed below, along with the requested designation.

NTSB Recommendations

H-15-10

Develop requirements addressing the minimum aisle width for safe evacuation from all buses, including those with moveable seats.

H-15-11

Determine whether the design of side-slide seats leads to seat belt entrapment that could result in reduced load capacity due to trapped belts or damage to belt webbing; if appropriate open a defect investigation to address this issue.

NHTSA Response

H-15-10

NHTSA continues to work toward addressing recommendation H-15-10 on motorcoach emergency egress. In 2010, NHTSA completed human factors research studies with the Volpe National Transportation System Center to evaluate emergency evacuation designs in current motorcoaches and buses. Volpe evaluated various egress strategies, including egress through windows of motorcoaches, and determined factors affecting egress rates. The final reports for this research work were completed in 2010 and are published in Docket No. NHTSA-2007-28793-22 and -24. We are reassessing the results of this research for applicability to this recommendation in order to determine NHTSA's next course of action. We request that recommendation H-15-10 be classified as "Open - Acceptable Action."

H-15-11

NHTSA defect investigative staff carefully reviewed the images and information provided in your letter. The webbing pictured is not trapped because of seat-side sliding, but wrapped behind the slide rail on the seat frame fixture. Given the significant amount of effort needed to position the seat belt webbing this way, it seems likely that it was done by passengers attempting to stow unused webbing. For example, under no known circumstances could the sliding mechanism result in the seat belt positioning pictured in Figure 1 of your letter. Belt webbing damage/fraying in this instance was most likely caused by the intentional misuse of the belt.

Regarding opening a defects investigation, we look carefully at the body of consumer complaints and other available data to determine whether a defect trend may exist and how severe that defect may be to safety. For this vehicle, NHTSA did not find any significant information. When our investigations indicate that vehicles or vehicle equipment contain safety defects in their design, construction, or performance, NHTSA has the authority to order manufacturers to recall and repair them. We do not find it appropriate in this case.

For these reasons, NHTSA requests that Safety Recommendation H-15-11 be "Closed - Acceptable Action."

Summary

We are requesting that Safety Recommendation H-15-10 be classified as "Open - Acceptable Response," and H-15-11 be classified as "Closed - Acceptable Action." If you have any questions, or require additional information, please contact me or Mr. David Sutula, our NTSB Liaison, at 202-366-3273, or via e-mail at david.sutula@dot.gov.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jack Danielson". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jack Danielson
Acting Deputy Administrator