

**W. Va. 126CSR89, Policy 4334, West Virginia Design and Equipment Requirements for School Transportation Vehicles
Comment Log**

May 14, 2025 – June 14, 2025

Action

A/S Comment was accepted and supports the proposed policy

A/C Comment was accepted and resulted in changes to the proposed policy

N Comment was not accepted

DATE	COMMENTER	COMMENTS	ACTION	RATIONALE
		§126-89-1. General.		
		N/A		
		§126-89-2. Incorporation by Reference		
		N/A		
		§126-89-3. Public School District Requirements.		
		N/A		
		§126-89-4. Severability.		
		N/A		
West Virginia Minimum Requirements for the Design and Equipment of School Transportation Manual				
5-19-25	Larry Fowler Sales Manager Matheny Motor Truck Co. Mineral Wells WV	<p>Page 5. Suggestion for item A (Parking Brake) to cover buses that air brakes that may use park pawl transmissions.</p> <p>A. All air brake equipped buses shall incorporate a park brake interlock that requires the service brake be applied to allow release of the parking brake with key in the off or run position.</p> <p>Type A buses with hydraulic brakes and park pawl transmissions must have the key in the on or run position to move the transmission selector into gear.</p>	A/C	Page 5 changed for better clarification
		<p>Page14 There are no minimum specification for the operator seat. I suggest we add back what was removed.</p> <p>Operators seat shall be of the air ride high-back type with a minimum seat back adjustment of 15 degrees and with a head restraint to accommodate a 95th percentile adult male as defined in FMVSS 208. The lower seat cushion and back shall have fabric covering. The seat shall also have lumbar support.</p>	A/C	Page 14 - added language for bus operator's seat.

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		<p>Page 15 Suggested change to provide clarity.</p> <p>The last seat on the left on all buses with a rear emergency door shall not exceed 30" in width.</p> <p>Page 19 I recommend this be moved to the seat section on page 15 and removed from page 19. I believe this is referring to seat belt ready seats and is something most counties want.</p> <p>Seat frames shall be equipped with attachments or devices to which belts, restraining harnesses, or other devices may be attached. Attachment framework or anchorage devices, if installed shall conform to FMVSS 210.</p>	<p>A/C</p> <p>N</p> <p>A/C</p>	<p>Page 15 - changed for clarification</p> <p>Page 19 - This refers to CSRS restraining devices</p> <p>"Restraining harnesses" is not the correct wording.</p>
6-6-25	Peggy Stone Director of Transportation Lincoln County Schools	<p>Power Lift: in section A. why does the lift always have to be in the back of the bus. We are transporting medically fragile Students in the roughest riding part of the school bus by Requiring the lifts to be in the back of the school bus.</p>	A/C	Allows counties to order buses with the lift anywhere on the right side of the bus
6-6-25	Peggy Stone Director of Transportation Lincoln County Schools	<p>Wheelchair restraints: A. All mobile seating must be in a forward-facing direction secured with at least a four point tie-down system with at least two tie-downs at the rear and two tie-downs at the front of the device. (the tie-down systems should be adjustable so it can be adjusted and secured correctly depending on the size of the wheelchair.)</p> <p>I. A floor anchorage system shall be installed that maintains the seating versatility of the school bus with a minimum of one wheelchair position. (It should be a minimum of two wheelchair positions, it is cheaper for the county to have it built with the bus instead of adding it later on when it is needed.)</p>	<p>A/C</p> <p>A/C</p>	<p>Adds language about adjustability to fit all sizes of wheelchairs</p> <p>Need added position because it is cheaper to order the bus with two spaces versus adding the extra space later.</p>
6-13-25	Peggy Stone Director of	<p>Section A air cleaners have been omitted AIR CLEANER</p>	A/C	This was accidentally omitted

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		<p>D. All brake lines, power and booster-assist lines shall be protected from excessive heat and vibration, and be installed to prevent chafing.</p> <p>E. All brake systems shall be designed to permit visual inspection of brake lining wear without removal of any chassis components.</p> <p>F. Air disc type brakes installed by chassis manufacturers are permissible.</p> <p>G. Exhaust and engine brakes, and retarders are an approved option for Type C and D school buses. Installation must be made by, or under the supervision of the vehicle manufacturer.</p> <p>BRAKE, PARKING</p> <p>Parking brake, when applied, shall remain in applied position despite exhaustion of source of energy used for application or leakage of any kind. All non-park pawl transmissions shall incorporate a park brake interlock that requires the service brake to be applied to allow release of the parking brake.</p> <p>DRIVE SHAFT was omitted</p> <p>A. Torque capacity of the drive shaft assembly shall exceed maximum engine torque as developed through lowest transmission gear reduction.</p> <p>B. Each drive shaft section shall be protected by a metal guard or guards around circumference of drive shaft to prevent whipping through the floor or dropping to the ground if broken</p>	<p align="center">A/C</p>	<p>Addresses exhaustion of source of energy for application or leakage of any kind.</p> <p>This was accidentally omitted</p>
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		<p>EXHAUST SYSTEM omitted</p> <p>A. After treatment device and tailpipe shall be outside the bus body and attached to the chassis, with hangers designed to accommodate expansion and contraction of the system without damage to the system or hanger(s).</p> <p>B. Tailpipe shall be constructed of a corrosion-resistant tubing material at least equal in strength and durability to 16 gauge steel tubing.</p> <p>C. Tailpipe shall be flush with but not extend more than 1" beyond the perimeter of the body.</p>		<p>This was accidentally omitted</p>
<p>6-13-25</p>	<p>Peggy Stone Director of Transportation Lincoln County Schools</p>	<p>A. Type C vehicles.</p> <ol style="list-style-type: none"> 1. Rubber fender extenders shall be provided unless fender design prevents spray from tires to the windshield and mirrors and deletion is approved by the State Executive Director of School Transportation. 2. Front fenders shall be properly braced and free from any body attachment. Adequate clearance shall be maintained between tires and fenders so that contact will not occur under any condition. 3. A fiberglass tilt hood shall be provided with wiring quick-disconnect in engine compartment, located at or near the radiator cradle. All electrical wiring between the fiberglass hood and the engine compartment shall pass through waterproof disconnect device(s) to facilitate removal and/or replacement of the hood. 4. Mud flaps shall be furnished by body manufacturer. 5. Fender/bumper design must prevent direct road spray between fender and front bumper, or a flap must be 	<p>A/C</p>	<p>This was accidentally omitted</p>

