



Denver Public Schools
Transportation Services
2909 W 7th Ave Denver Co. 80204

March 1, 2010

Mr. Bruce Little, Senior Consultant
School Nutrition and Transportation
Colorado Department of Education
201 E Colfax Ave.
Denver, Co 80203

Dear Bruce,

The intent of this letter is to request a revision to the proposed language in **2251-R-15.00 Preventative Maintenance Program Minimum Criteria of the Rules for the Annual Inspection of School Transportation Vehicles 301-29**. The final proposed revision is scheduled for review by the State Board of Education on March 10, 2010.

Current language:

2251-R-13.00 Preventative Maintenance Program Minimum Criteria

The District shall ensure that preventative maintenance is performed and documented on all school transportation vehicles. The preventative maintenance inspection shall include, as a minimum, check the brake adjustment. On air brake system, the applied pressure method shall be used. The inspection interval program shall not exceed 4,000 miles.

Final proposed revision:

2251-R-15.00 Preventative Maintenance Program Minimum Criteria

15.01 The district/service provider shall ensure that preventative maintenance is performed and documented on all school transportation vehicles. The preventative maintenance inspection shall include, as a minimum, checking the brake adjustment. The inspection interval program shall not exceed 4,000 miles.

Proposed revision to the final revision:

2251-R-15.00 Preventative Maintenance Program Minimum Criteria

15.01 The district/service provider shall ensure that preventative maintenance is performed and documented on all school transportation vehicles. The preventative maintenance inspection shall include, as a minimum, checking the brake adjustment. The inspection interval program shall not exceed 6,000 miles. Buses equipped with manual slack adjusters shall not exceed 4,000 miles.

The **Rules for the Annual Inspection of School Transportation Vehicles** indicates throughout the document vehicle maintenance must meet or exceed manufacturer's specifications as clearly stated in **2251-R-14.00 Minimum Annual Inspection Criteria - All annual inspection criteria must meet or exceed manufacturer's specifications.**

However, for preventative maintenance the Rules require more frequent inspections which are well beyond manufacturer's recommendations. Changing the preventative maintenance (PM) interval will better align PM schedules with manufacturer recommendations. Current rules far exceed these recommendations by requiring maintenance performed at a cycle twice and three times more frequent than manufacturer recommendations. Although the Rules for the Annual Inspection highlight a minimum standard, the Rules create a standard which is well beyond a minimum.

The following maintenance intervals were provided by the three major school bus manufacturer(s):

- ▶ International –BE/CE buses
 - Inspection A – 10,000 miles, 300 hrs or 6 months whichever comes first
 - Inspection B – 20,000 miles, 600 hrs or 1 year whichever comes first

- ▶ Bluebird – Inspections are based on specific component manufacturer recommendation
- ▶ Thomas Built – SAF-T-Liner C2
 - Based on less than 20,000 miles annually – Initial maintenance 4,000 miles or 6 months
 - M1 - 4,000 miles or 6 months
 - M2 – 8,000 miles or 12 months
 - Complete brake inspection (includes adjustments) – 8,000 mile interval
- ▶ Brake manufacturers – Inspection recommendations range from 6 months to 25,000 miles
 - Includes Bendix, Haldex and Meritor (includes automatic slack adjusters)

The 4,000 mile PM interval was primarily implemented to cover the brake inspection to include manual slack adjusters which were replaced with automatic slack adjusters over ten years ago. Since that time all new school buses come equipped with automatic slack adjusters yet the PM intervals remain as is and have not kept pace with industry changes.

The school bus industry has made tremendous progress over the years. Vehicles today are safer and far more advanced in technology with equipment lasting well beyond the standards of old. Filters, brakes, oil to name just a few, have an expected life of 10,000 miles and beyond.

Supporting this change provides school districts the flexibility to adjust their PM intervals to support daily operations, align more closely with manufacturer's recommendations while creating efficiencies which ultimately can reduce cost.

As stated in rule 2251-R-12.00 School District/ Service Provider Rules- None of these rules shall preclude a school district/service provider from establishing a more rigid standard or policy when deemed necessary by the school district.

This change allows districts to remain status quo or make decisions which best support their operation, is applicable to the technologies of today, and is not based on a standard established over twenty years ago. As stated in 2251-R-15.00 Preventative Maintenance Program Minimum Criteria, the 6,000 PM interval establishes a minimum baseline based on current manufacturer recommendations and creates an opportunity for department efficiencies.

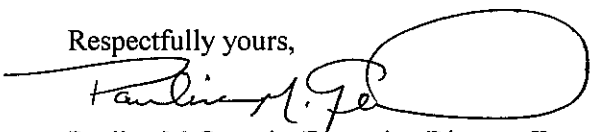
Another very important benefit to mention is cost. Increasing the mileage to 6,000 miles for preventative maintenance has a potential to reduce cost by changing the current cycle from three to two which translates to an estimated annual savings of \$56K in Denver alone. Additionally, this creates less interruption and keeps buses in service. During this time of financial crisis we should grasp every opportunity to reduce cost, improve service, and make change happen.

Our industry has left us behind and it's time for Colorado to move forward and truly create a standard more closely aligned with manufacturer recommendations.

This effort allows transportation to continue to provide a safe, reliable efficient service in a timely manner. The proposed revision to the current language supports this effort.

Your consideration is appreciated.

Respectfully yours,



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