

January 7, 2016

**TO:**

City of Milwaukee Public Safety Committee Members  
Milwaukee City Hall, Room 301-B  
200 E. Wells Street  
Milwaukee, WI 53202

**FROM:**

Wisconsin School Bus Association Members Serving Milwaukee Public Schools

**RE:**

Proposed Substitute Ordinance E, #150648  
Relating to the Display of Warning Lights by School Buses

Chairman Witkowski and Committee Members:

School bus contractor members of the Wisconsin School Bus Association serving Milwaukee Public Schools oppose the adoption of #150648 Proposed Substitute Ordinance E.

Language contained in the proposed substitute ordinance confuses school bus equipment terminology relative to their lighting systems, while not accounting for how that school bus equipment is capable of operating in the State of Wisconsin.

Wisconsin School Bus Flashing Warning Lights System

Proposed substitute ordinance "Analysis" sections b-1 and b-2, and section 101-48 b-1 and b-2 infer the ability to use flashing red warning lights and flashing amber warning light independently when picking up and discharging students. In fact, the flashing red and flashing amber warning lights referred to in these sections are part of a *single system* that is only used under state statutes when there is an absence of a curb or a sidewalk on one side of the roadway (please see attached diagram). The amber warning lights cannot, by design, stay activated when the service door of the school bus opens to load or discharge students. If the warning light system is activated, the red flashing warning lights and the stop arm will activate immediately once the bus service door is opened to load or discharge students.

Yellow hazard lights are currently used to load and discharge students where a curb and a sidewalk exist on both sides of the roadway, typically considered an urban setting.

These systems are standard equipment in Wisconsin School Buses and are required by Wisconsin Department of Transportation Chapter Trans Code 300 to operate only in the manner proscribed by the State of Wisconsin.

Attached are excerpt pages from the Wisconsin Commercial Driver's Manual, intended for use in training Wisconsin Commercial Drivers, and showing the two systems defined with their respective procedure.

Defining When an Urban-type of Loading/Discharge Procedure Should Continue to be Used

Proposed substitute ordinance “Analysis” sections b-1, and section 101-48 b-1 attempt to define when a school bus driver should use the urban procedure used under current law, and when overhead warning lights should be used according to the new ordinance. In doing so, it defines that the warning light system is the exception that should be used *“If the school bus operator has to stop the bus wholly or partially in a traffic lane on a one-way street or 2-way street with only 2 traffic lanes.”*

While we appreciate the attempts that have been made to define the road characteristics under which the flashing warning lights procedure should be used, the definition used will cause confusion on the part of the school bus drivers who will be charged with implementing it. This is the most recent language that we see substituted in an effort to narrowly define when flashing warning lights will be used, but it still falls short in defining for a driver how the number of “traffic lanes” is to be determined by a driver (i.e. pavement markings; traffic legally allowed to travel in opposing directions, etc.) Neither does it address streets that may have a single traffic lane. In multiple attempts to narrow the environments in an urban setting where flashing warning lights may be used, we continue to have difficulty creating a definition that is easily understood and followed by its expected users, school bus drivers.

As written this proposed change cannot be supported by the industry.

Attachments: Wisconsin School Bus Flashing Warning Light System Diagram  
Wisconsin Commercial Driver’s Manual Excerpted Pages

# WISCONSIN SCHOOL BUS FLASHING WARNING LIGHT SYSTEM



Flashing AMBER  
Warning Lights

Flashing RED  
Warning Lights



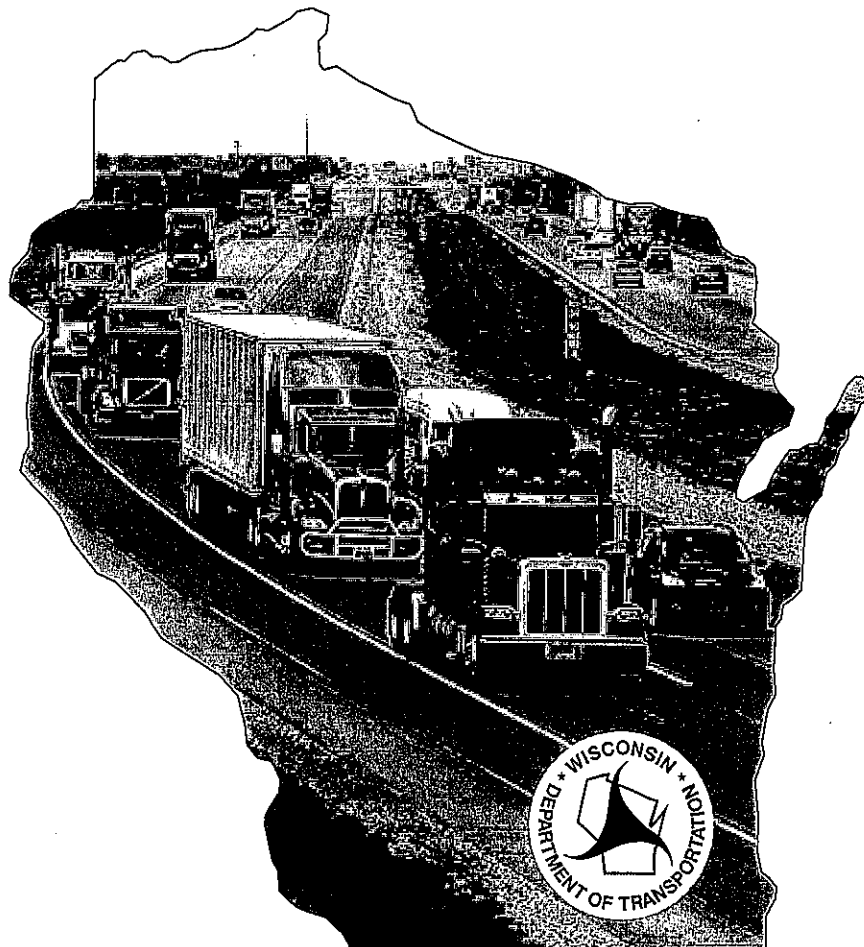
## YELLOW HAZARD LIGHTS



# Wisconsin Commercial Driver's Manual

[wisconsindmv.gov](http://wisconsindmv.gov)

May 2015



### 10.1.4 OUTSIDE LEFT AND RIGHT SIDE CONVEX MIRRORS

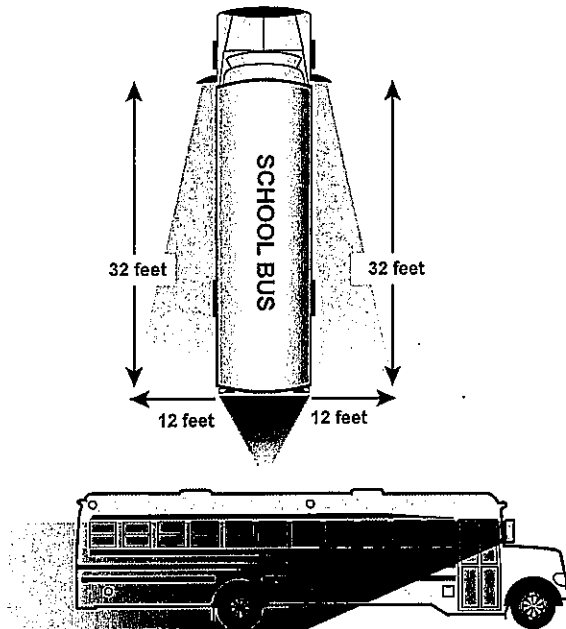
The convex mirrors are located below the outside flat mirrors. They are used to monitor the left and right sides at a wide angle. They provide a view of traffic, clearances and students at the side of the bus. These mirrors present a view of people and objects that does not accurately reflect their size and distance from the bus.

You should position these mirrors to see:

- The entire side of the bus up to the mirror mounts.
- Front of the rear tires touching the ground.
- At least one traffic lane on either side of the bus.

Figure 10-3 shows how both the outside left and right side convex mirrors should be adjusted.

*Figure 10-3: Left and Right Side Convex Mirrors*



May use in conjunction with the left and right side standard (flat) mirrors to obtain desired visibility.

### 10.1.5 OUTSIDE LEFT AND RIGHT SIDE CROSSOVER MIRRORS

These mirrors are mounted on both left and right front corners of the bus. They are used to see the front bumper "danger zone" area directly in front of the bus that is not visible by direct vision and to view the "danger zone" area to the left side and right side of the bus, including the service door and front wheel areas. The mirror presents a view of people and objects that does not accurately reflect their size and distance from the bus. The driver must ensure that these mirrors are properly adjusted.

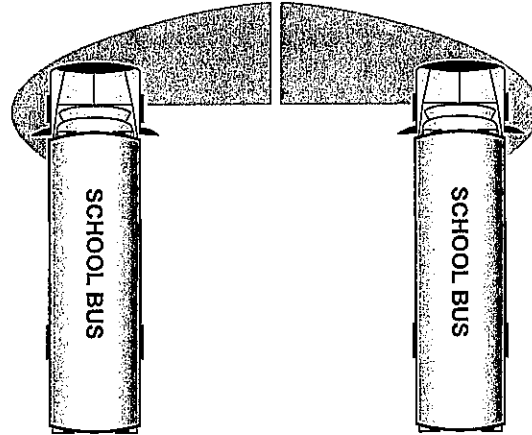
Ensure these mirrors are properly adjusted so you can see:

- The entire area in front of the bus from the front bumper at ground level to a point where direct vision is possible. Direct vision and mirror view vision should overlap.
- The right and left front tires touching the ground.
- The area from the front of the bus to the service door.

These mirrors, along with the convex and flat mirrors, should be viewed in a logical sequence to ensure that a child or object is not in any of the danger zones.

Figure 10-4 illustrates how the left and right side crossover mirrors should be adjusted.

*Figure 10-4: Left and Right Side Crossover Mirrors*



### 10.1.6 OVERHEAD INSIDE REARVIEW MIRROR

This mirror is mounted directly above the windshield on the driver's side area of the bus. This mirror is used to monitor passenger activity inside the bus. It may provide limited visibility directly in back of the bus if the bus is equipped with a glass-bottomed rear emergency door.

There is a blind spot area directly behind the driver's seat as well as a large blind spot area that begins at the rear bumper and could extend up to 400 feet or more behind the bus. You must use the exterior side mirrors to monitor traffic that approaches and enters this area.

You should position the mirror to see:

- The top of the rear window in the top of the mirror.
- All of the students, including the heads of the students right behind you.

## 10.2 Loading and Unloading

More students are killed while getting on or off a school bus each year than are killed as passengers inside of a school bus. As a result, knowing what to do before, during, and after loading or unloading students is critical. This section will give you procedures to help you avoid unsafe conditions which could result in injuries and fatalities during and after loading and unloading students.

### *Routes, Stops, Pickup and Discharge Points*

Each school district establishes official routes and official school bus stops. All stops should be approved by the school district prior to making the stop. You should never change the location of a bus stop without written approval from the appropriate school district official.

Select pickup and discharge points carefully. Report those sites that are dangerous to local School Boards. Other drivers should be able to see the bus in plenty of time.

## Using Flashing Red Warning Lights

A school bus has no special right of way privileges on highways except when picking up or discharging students. When you stop, you must use the flashing red warning lights and the stop arm.

All vehicles must stop no closer than 20 feet to a stopped school bus with flashing red warning lights. The only exception is vehicles traveling in the opposite direction on a divided highway. Do not use flashing red warning lights where both sides of the road have curb and sidewalk, unless required by local ordinance.

*Operators of vehicles proceeding in the opposite direction on a divided highway are not required to stop for stopped school buses displaying flashing red warning lights (s.346.48(1)), Wisconsin Statutes.*

School bus drivers are responsible for reporting to appropriate law enforcement agencies, incidents of drivers who do not stop for a stopped school bus with flashing red warning lights activated. Note time and location, license number, color and type of vehicle, weather and road conditions.

### 10.2.1 APPROACHING THE STOP

You must use extreme caution when approaching a school bus stop. You are in a very demanding situation when entering these areas. It is critical that you understand and follow all state and local laws and regulations regarding approaching a school bus stop. This includes the proper use of mirrors, flashing red warning lamps, the moveable stop arm and when equipped, the crossing control arm.

When approaching the stop, you should:

- Approach cautiously at a slow rate of speed.
- Look for pedestrians, traffic or other objects before, during and after coming to a stop.
- Continuously check all mirrors.
- Turn on flashing red warning lights at least 100 feet before the stop or sooner if conditions warrant.
- Determine if other drivers have observed flashing red warning lights and have time to stop.
- Stop in the farthest right driving lane.
- Bring the bus to a full stop with the front bumper at least 10 feet away from students at the designated stop. This forces students to walk to the bus so you have a better view of their movements.
- Activate the stop arm only after the bus has stopped and before opening the door.
- Place the transmission in Park or Neutral and apply the foot brake to prevent the bus from accidentally moving.
- Make a final check to see that all traffic has stopped before completely opening the door and signaling students to approach.

### 10.2.2 LOADING PROCEDURES

- Perform a safe stop as described in subsection 10.2.1.
- Students should wait in a designated location for the school bus, facing the bus as it approaches.
- Students should board the bus only when signaled by the driver.
- Monitor all mirrors continuously.
- Count the number of students at the bus stop and be sure all board the bus. If possible, know names of students at each stop. If there is a student missing, ask the other students where the student is.
- Have the students board the bus slowly, in single file, and use the handrail. The dome light should be on while loading in the dark.
- Wait until students are seated and facing forward before moving the bus.
- Check all mirrors. Make certain no one is running to catch the bus.
- If you cannot account for a student outside, secure the bus, take the key, and check around and underneath the bus.
- When all students are accounted for, prepare to leave by:
  - » Checking all mirrors including the crossover mirror(s).
  - » Closing the door to retract the stop arm.
  - » Engaging the transmission.
  - » Turning off the flashing red warning lights.
  - » Allowing congested traffic to disperse.
  - » Check the crossover mirror(s) and both outside rear view mirrors again.
- When it is safe, move the bus, enter the traffic flow and continue the route.

**Note:** Do not use the flashing red warning lights when operating a school bus to transport adults or when a school bus is being used for non-school functions. When the bus is used for these situations, cover the words, "school bus" on the front and rear of the bus.

**Wisconsin Exception:** If transporting children for any purpose, school bus markings may remain uncovered and flashing red lights used (s.346.48(2)(c), Wisconsin Statutes).

**Without Flashing Warning Lights**

If you are loading or discharging students in areas where flashing warning lights are not required, follow these procedures:

- Activate the yellow hazard lights at least 100 feet before the stop.
- Check traffic and move over to the right curb.
- Observe traffic carefully.
- Tell students to stand away from the road when waiting to board and to move away from the bus immediately after they get off.
- Instruct students who must cross the street to go to the cross walk and wait until it is safe to proceed.
- When students are safely aboard or unloaded, turn off the hazard warning lights, check traffic and use the left turn signal to re-enter traffic. Teach students these procedures. Work with parents to promote safety.

**Loading Procedures at School**

The loading procedure is essentially the same wherever you load students, but there are slight differences at some locations. When students are loading at the school campus, you should:

- Arrive before students are in the loading area at dismissal time.
- Drive slowly in and near the school loading area.
- Park in designated loading area.
- Turn off the ignition switch.
- Remove the key if you are leaving the driver's compartment and set the parking brake.
- Position yourself to supervise loading as required or recommended by your state or local regulations.
- After loading is complete, enter the traffic flow and continue the route.
- Do not pass other buses, remain in line.
- Maintain proper following distances, etc.

**10.2.3 UNLOADING PROCEDURES ON THE ROUTE**

Any school bus driver approaching the front or rear of a stopped school bus that is displaying flashing red warning lights shall also display its flashing red warning lights and stop arm while stopped.

- Perform a safe stop at designated unloading areas as described in subsection 10.2.1.
- Have the students remain seated until told to exit.
- Check traffic and all mirrors, especially the right outside mirror.
- Open the door and count the students as they leave the bus.
- After counting the students exiting the bus, partially close the door so other students do not enter or exit.
- Students living on the left side of the road should wait 10–12 feet in front of the bus.
- Those living on the right should move away from the bus immediately. However, they should not move toward the rear of the bus.
- Recheck traffic and all mirrors, especially the left outside mirror.

- After determining it is safe to cross, give a clear hand signal to students while keeping a lookout for traffic. Choose a predetermined signal such as sounding the horn to warn students if there is danger. Choose a signal that will not be misunderstood by the other drivers. Continuously monitor all mirrors.
- Recount all students who have been discharged. (Those crossing the road and on the right side of the bus.)
- If you cannot account for a student who has been discharged, secure the bus, take the key and check around and underneath the bus.
- When all students are accounted for, prepare to leave by:
  - » Checking all mirrors, including the crossover mirror(s).
  - » Closing the door to retract the stop arm.
  - » Engaging the transmission.
  - » Turning off the flashing red warning lights.
  - » Allowing congested traffic to disperse.
  - » Check crossover mirror(s) and both outside rear view mirrors again.
- When it is safe, move the bus into the flow of traffic and continue the route.

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**Note:** If you have missed a student's unloading stop, do not back up. Be sure to follow local procedures.

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**Additional Procedures for Students Who Must Cross the Roadway**

You should understand what students are to do when exiting a school bus and crossing the street in front of the bus. In addition, you should also understand that students might not always do what they are supposed to do.

If a student or students must cross the roadway, they should follow these procedures:

- Walk approximately 10 feet away from the side of the school bus to a position where you can see them.
- Walk to a location at least 10 feet in front of the right corner of the bumper, but still remaining away from the front of the school bus.
- Stop at the right edge of the roadway. You should be able to see the student's feet.
- Upon your signal, the students should:
  - » Cross far enough in front of the school bus to be in your view.
  - » Walk to the left edge of the school bus, stop, and look again for your signal to continue crossing the roadway.
  - » Look for traffic in both directions, making sure the roadway is clear.
  - » Proceed across the roadway, continuing to look in all directions.
- The school bus driver should:
  - » Instruct students about the hazards that are part of riding the bus or crossing the road.
  - » Instruct them how to protect themselves in a crash and the proper evacuation procedures.



- » Remind children to continually follow safety procedures.
- » Inform them of expected, acceptable behavior.
- » Handle disciplinary problems as they occur.

#### 10.2.4 UNLOADING PROCEDURES AT SCHOOL

State and local laws and regulations regarding unloading students at schools, particularly in situations where such activities take place in the school parking lot or other location that is off the traveled roadway, are often different than unloading along a school bus route. It is important that the school bus driver understands and obeys state and local laws and regulations. The following procedures are meant to be general guidelines when unloading at the school:

- Drive slowly in and near the school unloading area.
- Park in designated area.
- Never back a bus on school grounds.
- Come to a complete stop.
- Shift to park or neutral and apply foot brake.
- Secure the bus by:
  - » Turning off the ignition switch, engage the parking brake.
  - » Removing the key if you are leaving the driver's compartment.
- Have the students remain seated until they are told to exit.
- Position yourself to supervise unloading as required or recommended by your state or local regulations.
- Have students exit in an orderly fashion.
- Observe the students as they step from the bus to see that they all promptly move away from the unloading area.
- Walk through the bus and check for hiding/sleeping students and items left by students.
- Check all mirrors. Make certain no students are returning to the bus.
- If you cannot account for a student outside the bus and the bus is secure, check around and underneath the bus.
- When all students are accounted for, prepare to leave by:
  - » Closing the door.
  - » Fastening your safety belt.
  - » Starting the engine.
  - » Engaging the transmission.
  - » Releasing the parking brake.
  - » Turning on your left turn signal.
  - » Checking all mirrors again.
  - » Allowing congested traffic to disperse.
- When it is safe, pull away from the unloading area.

#### 10.2.5 SPECIAL DANGERS OF LOADING AND UNLOADING

**Dropped or Forgotten Objects.** Always focus on students as they approach the bus and watch for any who disappear from sight.

Students may drop an object near the bus during loading and unloading. Stopping to pick up the object, or returning to pick it up, may cause the student to disappear from the driver's sight at a very dangerous moment.

Students should be told to leave any dropped object and move to a point of safety out of the danger zones and attempt to get the driver's attention before trying to retrieve the object.

**Handrail Hang-ups.** Students have been injured or killed when clothing, accessories or even parts of their body get caught in the handrail or door as they exited the bus. You should closely observe all students exiting the bus to confirm they are in a safe location prior to moving the bus.

#### 10.2.6 POST-TRIP INSPECTION

When your route or school activity trip is finished, you should conduct a post-trip inspection of the bus by walking through and around the bus looking for the following:

- Articles left on the bus.
- Sleeping students.
- Open windows and doors.
- Mechanical/operational problems with the bus, with special attention to items that are unique to school buses – mirror systems, flashing warning lamps and stop signal arms.
- Damage or vandalism.

Any problems or special situations should be reported immediately to your supervisor or school authorities.

#### *Transporting Persons with Disabilities*

Transporting persons with special needs or physical disabilities requires patience and understanding. Follow your company guidelines. Some general rules are:

- When raising or lowering persons on the power ramp, hold onto the wheel chair.
- Secure the wheel first and then the occupant.
- Know an individual's special health or behavioral problems.
- Practice vehicle evacuation.

Establish an understanding with the parents, guardians or other caregivers on their involvement in loading and unloading the person at home. Work with the parents and school officials to determine the location for pick up and discharge. Do not leave your bus unattended to assist a person with special needs unless the engine is shut off, parking brake is set and the keys are removed from the ignition.

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### 10.3 Emergency Exit and Evacuation

An emergency situation can happen to anyone, anytime, anywhere. It could be a crash, a stalled school bus on a railroad-highway crossing or in a high-speed intersection, an electrical fire in the engine compartment, a medical emergency to a student on the school bus, etc. Knowing what to do in an emergency before, during and after an evacuation can mean the difference between life and death.