Regulatory Analysis Form

(Completed by Promulgating Agency)

(All Comments submitted on this regulation will appear on IRRC's website)

INDEPENDENT REGULATORY REVIEW COMMISSION

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Independent Regulatory Review Commission

September 30, 2026

IRRC Number: 3488

(1) Agency Department of Transportation

(2) Agency Number:

Identification Number: 18-491

(3) PA Code Cite: 67 Pa. Code Chapter 171, § 171.58

(4) Short Title:

Mid-Cabin Cameras

(5) Agency Contacts (List Telephone Number and Email Address):

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(6) Type of Rulemaking (check applicable box):

- ☐ Proposed Regulation
- ☒ Final Regulation
- ☐ Final Omitted Regulation
- ☐ Emergency Certification Regulation;
  - ☐ Certification by the Governor
  - ☐ Certification by the Attorney General

(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)

Currently, the Pennsylvania State Police interprets § 171.58(1) to prohibit mid-cabin cameras that are not a flush-mount design as unnecessary projections in the interior of every school bus. Since 2021, the Department of Transportation (Department) has waived the requirements of § 171.58 (1) as it relates to mid-cabin cameras at the request of the Pennsylvania School Bus Association (PSBA). According to the PSBA, mid-cabin school bus cameras are necessary for the safety of the passengers in the school bus. This final regulation provides an exception to § 171.58(1) to allow for mid-cabin cameras and imposes

requirements for existing and newly installed mid-cabin cameras to ensure the safety of school bus passengers in the event of a rollover crash.

(8) State the statutory authority for the regulation. Include specific statutory citation.

This final rulemaking is authorized under the following provisions of the Vehicle Code (75 Pa.C.S. §§ 101—9910): 75 Pa. C.S. §§ 4103, 4551, and 6103. Specifically, 75 Pa.C.S. § 4103(a) (relating to promulgation of vehicle equipment standards) states that "The department shall promulgate vehicle equipment standards for vehicles, equipment, and devices required under this part." Section 4551(a) (relating to safety regulations) states, in pertinent part, "Regulations shall be promulgated by the department governing the safe design, construction, equipment, and operation of vehicles engaged in the transportation of school children." Finally, under 75 Pa.C.S. § 6103 (relating to promulgation of rules and regulations by department), the department has broad rulemaking authority to promulgate, consistent with and in furtherance of the Vehicle Code, rules and regulations in accordance with which the department shall carry out its responsibilities and duties.

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as, any deadlines for action.

No, this final regulation is not mandated by any federal or state law or court order, or federal regulation. Additionally, there are no relevant state or federal court decisions.

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

67 Pa. Code § 171.58 requires that the interior of the school bus be free of unnecessary projections likely to cause injury. The Pennsylvania State Police has interpreted this section to prohibit mid-cabin cameras that are not a flush-mount design. Because of this interpretation, the Pennsylvania School Bus Association (PSBA) petitioned the Secretary for a waiver of 67 Pa. Code § 171.58 to allow school buses with mid-cabin cameras to pass inspection so long as they met certain safety requirements. Under 1 Pa. Code § 35.18, a petition may be filed for the issuance, amendment, waiver, or repeal of a regulation. On August 18, 2021, the Secretary granted the petition for the waiver of 67 Pa. Code § 171.58. The waiver has been extended numerous times and will remain in effect until 2028.

The Department hereby amends the regulation to make clear that mid-cabin cameras are permitted provided they meet certain safety requirements. Safe installation of mid-cabin cameras plays an important part in ensuring the safety of students in the event of a rollover crash, as well as ensuring the security of the school bus through video surveillance. The department has been approached by several individuals in the school bus industry who have requested this final regulation to clarify that mid-cabin cameras are permitted on a school bus. School districts typically require school bus contractors to install and maintain mid-cabin cameras for student safety purposes. Schools often require

mid-cabin cameras for complete coverage. Hundreds of mid-cabin cameras have been installed in Pennsylvania school buses over a period of many years. According to the PSBA membership, more than 1,189 school buses were reported to be outfitted with mid-cabin cameras. This final regulation will benefit all passengers of Pennsylvania school buses as well as the school bus companies and school districts that rely on mid-cabin cameras to maintain the safety of the school students by providing clarity on the requirements for mid-cabin cameras on school buses. There is potential for injury if the mid-cabin camera is not properly placed or does not have impact resistant parts or has sharp edges. This regulation ensures that the mid-cabin camera is installed safely in the school bus to promote the safety and security of school students on the school bus.

(11) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations.

No, this final regulation is not more stringent than federal standards.

(12) How does this regulation compare with those of the other states? How will this affect Pennsylvania's ability to compete with other states?

Of the 50 states, 21 states responded to the Department's survey on the installation of mid-cabin cameras in the interior cabin of school buses. Two of the states that responded to the survey, namely Delaware and Ohio, border Pennsylvania and both allow mid-cabin cameras in school buses. Twenty-one states permit school bus organizations to install mid-cabin cameras in their vehicles, so long as it complies with state safety regulations. Amending the regulations this way will increase Pennsylvania's competitiveness with the remainder of the country in that Pennsylvania, similar to Delaware and Ohio, would now be formally allowing mid-cabin cameras in school buses with a final regulation that ensures the safety of students in roll over crashes. By adding clarity, the final regulation improves Pennsylvania's competitiveness with other neighboring states.

(13) Will the regulation affect any other regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

No, this regulation will not impact or compromise any other regulations established by the Department or other Pennsylvania state agencies.

(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. ("Small business" is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

This final regulation was developed by the Department with the public interest in mind. Requests for amendments to the existing regulation were presented by various individuals from the school bus industry, including the PSBA, as well as the Pennsylvania State Police (PSP). PSBA, PSP and PennDOT held various meetings and work sessions to deliberate on the interests of the school bus industry on this matter. Additionally, in July of 2025, both PSBA and PSP were sent exposure drafts of the proposed regulation for their review and comment. PSBA had no comment at that time to the exposure draft of the proposed regulation. The PSBA represents the school bus industry as a whole, so the Department has not communicated with individual businesses, as their interests are represented by the PSBA.

Notice of the proposed rulemaking was published at 56 Pa.B. 3321 (June 6, 2026). Publication was followed by a 30-day public comment period. The Department received 12 comments from various school bus companies, a State Certified School Bus Instructor, and a vendor and supplier of school bus camera systems, as well as the PSBA. All public commentators supported the proposed regulation and requested or encouraged the Department to promulgate the regulation. On August 5, 2026, the Independent Regulatory Review Commission (IRRC) as part of its review of the proposed rulemaking under the Regulatory Review Act (71 P.S. §§ 741.10745.15), indicated that IRRC had no comments on the proposed rulemaking. The Department did not receive any comments from the Senate and House Transportation Committees as part of their review of the proposed rulemaking under the Regulatory Review Act. The Department has taken these comments into consideration in this final-form rulemaking.

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected?

Generally speaking, those impacted by this final-form regulation will be school bus companies, which would now be expressly permitted to place cameras within the interior cabin of the bus for safety and security purposes. Those impacted by this final-form regulation would also include school districts. This regulation would affect the school districts and school bus companies that own over 1,189 buses that are currently reported to be outfitted with mid-cabin cameras, as well as those that may install mid-cabin cameras in the future. Students and parents of those students riding in the school bus would be impacted due to the increased surveillance within the school bus vehicle. According to the Small Business Administration's (SBA) size table, school and employee bus transportation companies (NAICS Code 485410) earning less than $30.0 million annually are considered small businesses. Therefore, while the Department has not individually surveyed the school bus company income, the Department assumes that the vast majority of school bus transportation companies are small businesses. The regulation also affects the manufacturers and sellers of school bus mid-cabin camera systems. According to the SBA size table, photographic equipment and supplies merchant wholesalers (NAICS Code 423410) are considered small businesses if they have fewer than 200 employees, and audio and video equipment manufacturing companies (NAICS Code 334310) are considered small if they have fewer than 750 employees. Again, while the Department has not surveyed the number of employees working in photographic equipment sales or video equipment manufacturing, the Department assumes that the vast majority of the businesses in these industries are small businesses and will be affected by

the regulation. It should be noted that this regulation does not mandate the installation of mid-cabin cameras, but rather ensures that those mid-cabin cameras that are installed or newly installed meet safety requirements that are necessary in the event of a school bus rollover crash.

(16) List the persons, groups or entities, including small businesses, that will be required to comply with the regulation. Approximate the number that will be required to comply.

School Bus manufacturers, as well as school bus organizations and school districts or individual schools owning buses, will be required to comply. This regulation will directly impact the 1,189 buses that are currently reported to be outfitted with mid-cabin cameras and any school buses that are equipped with mid-cabin cameras in the future.

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

The final-form regulation does not mandate the installation of mid-cabin cameras on school buses. However, those school bus manufacturers, school bus organizations, school districts and individual schools that choose or have chosen to install mid-cabin cameras must comply with the requirements of the regulation.

Financially and economically, school bus organizations would bear the cost of retrofitting existing cameras to ensure compliance with the regulation. The cost of acquiring new mid-cabin camera technology for their school buses is entirely voluntary. This would include the cost and installation of video cameras for the school buses that are compliant with this proposed regulation.

Economically, the Department anticipates that there will be increased competition between school bus manufacturers producing school bus vehicles with already installed mid-cabin cameras that comply with the regulation.

Socially, this proposed regulatory amendment would promote more effective control of the safety and security of the school buses, as well as provide more transparency of what happens on school buses due to increased surveillance. The prohibition against protrusions from the ceiling is meant to prevent injuries to passengers in the event of the bus rolling over. Most school buses do not have seat belts; in a rollover crash, passengers end up on the ceiling. Many schools and school bus companies decide to install cameras to deter bad behavior and to record the misbehavior if it occurs. Properly installed mid-cabin cameras play an important part in ensuring the safety of students in the event of a rollover crash, as well as ensuring the security of the school bus through video surveillance.

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

The benefits of this amendment would be increased security through improved surveillance on school buses for school bus organizations and school districts. In addition, there will be increased economic competition within the school bus market.

As stated above, the regulation does not mandate the installation of school bus mid-cabin cameras, but ensures that those mid-cabin cameras are safe in the event of a rollover crash. For the 1,189 buses that are currently reported to be outfitted with mid-cabin cameras, those buses will have to ensure that the mid-cabin cameras meet the requirements of this final-form regulation. The cost of compliance with the final-form regulation should be minimal in comparison to the benefit of ensuring that the mid-cabin cameras are safe in the event of a rollover crash. The PSP, the school bus manufacturers, school districts that own school buses and school bus companies are not newly impacted as these entities are already complying with the waiver, which includes the same safety requirements for mid-cabin cameras as the final-form regulation. School bus manufacturers may incur minor costs if they decide to install new mid-cabin cameras, however the additional financial impact is expected to be minimal.

(19) Provide a specific estimate of the costs and/or savings to the **regulated community** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

The minimal costs anticipated include the cost of ensuring that the currently installed mid-cabin cameras comply with the final-form regulation. Essentially, school bus companies and schools that have installed or choose to install mid-cabin cameras must ensure these mid-cabin cameras comply with the final-form regulation. The regulated community will incur the cost of ensuring that existing mid-cabin cameras are appropriately placed within the bus cabin and that the mid-cabin cameras do not have sharp edges or other components that violate the final-form regulation. The PSP conducts the school bus inspections and will have to ensure that the school bus complies with the final-form regulation. Because the PSP is already conducting school bus inspections under the current regulations and the waiver, there should be no additional costs to the regulated community associated with these inspections. There are no anticipated legal, accounting or consulting procedures.

The installation of cameras is not required, so there are no costs if the mid-cabin cameras are not installed. Many of the mid-cabin cameras that are currently installed already comply with the new language. Others may decide to replace mid-cabin cameras, while others may choose to remove them. So, there may be costs, but those costs will be dependent on what the school or school bus company decides to do.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

No costs or savings to local governments are anticipated, including the cost of legal, accounting or consulting procedures.

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

No costs or savings to the state government are anticipated. No legal, accounting, or consulting procedures would be required of the state government by this proposed regulation. The PSP is currently conducting inspections of school buses under the current regulation and waiver, and this proposed regulation should not add to the cost of that inspection.

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

The final-form regulation does not require any additional legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, for implementation.

(22a) Are forms required for implementation of the regulation?

No forms or documents are required for the implementation of this regulation.

(22b) If forms are required for implementation of the regulation, **attach copies of the forms here.** If your agency uses electronic forms, provide links to each form or a detailed description of the information required to be reported. **Failure to attach forms, provide links, or provide a detailed description of the information to be reported will constitute a faulty delivery of the regulation.**

No forms or documents are required for the implementation of this regulation.

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY Year	**FY +1 Year**	**FY +2 Year**	**FY +3 Year**	**FY +4 Year**	**FY +5 Year**
SAVINGS:	**$**	**$**	**$**	**$**	**$**	**$**
Regulated Community	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Local Government	N/A					
State Government	N/A					
Total Savings	N/A					
COSTS:	N/A					

Regulated Community	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Local Government	N/A					
State Government	N/A					
Total Costs	N/A					
REVENUE LOSSES:	N/A					
Regulated Community	N/A					
Local Government	N/A					
State Government	N/A					
Total Revenue Losses	N/A					

(23a) Provide the past three-year expenditure history for programs affected by the regulation.

Program	FY -3	FY -2	FY -1	Current FY
PSP Annual School Bus Inspection Campaign	$1,564,457	$1,562,743	$1,676,150	~$1,835,530 (estimated)

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

No adverse impact on small businesses is anticipated for this final-form regulation.

(25) List any special provisions which have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

No special provisions were developed to meet the particular needs of affected groups or persons.

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

There were no alternative regulatory provisions considered. While the Department could simply allow mid-cabin cameras to be installed regardless of their placement, impact resistance or sharp edges, the Department's primary concern is the safety of the students in the event of a rollover crash. Therefore, a regulation that would simply allow the placement of mid-cabin cameras regardless of rollover safety is not in the best interests of this Commonwealth. The final-form regulation updates existing requirements for school buses and is based on a collaboration between the Department and the school bus industry that considers the need for both student surveillance and rollover safety.

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

No adverse impact on small businesses is anticipated for this final-form regulation.

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

Data was not the basis for these amendments to the regulation.

(29) Include a schedule for review of the regulation including:

A. The length of the public comment period: 30 Days

B. The date or dates on which any public meetings or hearings will be held: To be determined.

C. The expected date of delivery of the final-form regulation: Fall 2026

D. The expected effective date of the final-form regulation: Upon publication in the *Pennsylvania Bulletin*

E. The expected date by which compliance with the final-form regulation will be required: _Upon publication in the *Pennsylvania Bulletin*. _____

F. The expected date by which required permits, licenses or other approvals must be obtained: _N/A_____

(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

The plan for evaluating the continuing effectiveness of the regulations after its implementation is to continue the Department's relationship with the PSBA which is taking an active role in monitoring developments and concerns within the school bus industry; as well as other private sector partners within the Pennsylvania school bus industry to ensure an open dialogue is maintained through the roll out and implementation of this proposed regulation.

The Department will also be keeping open and active channels for the public to bring forth their interests, questions and concerns.

CDL-1

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU

(Pursuant to Commonwealth Documents Law)

RECEIVED

Independent Regulatory
Review Commission

September 30, 2026

DO NOT WRITE IN THIS SPACE

Copy below is hereby approved as to form and legality. Attorney General	Copy below is here by certified to be a true and correct copy of a document issued, prescribed or promulgated by:	Copy below is hereby approved as to form and legality. Executive or Independent Agencies.
BY: _____ (DEPUTY ATTORNEY GENERAL)	Department of Transportation (AGENCY)	BY: Cynthia K Mosty (Deputy General Counsel, OGC) ~~(Chief Counsel, Independent Agency)~~ (Strike inapplicable title)
_____ DATE OF APPROVAL	DOCUMENT/FISCAL NOTE NO. 18-491 DATE OF ADOPTION: _____ BY: Mel Croll	September 18, 2026 DATE OF APPROVAL
☐ Check if applicable Copy not approved. Objections attached.	TITLE Secretary (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)	☐ Check if applicable. No Attorney General approval or objection within 30 days after submission.

FINAL RULEMAKING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION
DRIVER VEHICLE SERVICES

67 PA. CODE CHAPTER 171
§ 171.58

MID-CABIN CAMERAS

The Department of Transportation (department) hereby amends § 171.58 (relating to interior) to read as set forth in Annex A. This final-form rulemaking makes clear that mid-cabin cameras are permitted to be installed in school buses and mandates that mid-cabin cameras installed by school districts or school bus companies meet certain safety criteria to prevent injury in the event of a collision or vehicle rollover.

Effective Date

This final-form rulemaking will be effective upon publication in the *Pennsylvania Bulletin*.

Statutory Authority

This final-form rulemaking is authorized under 75 Pa.C.S. (relating to Vehicle Code). Specifically, 75 Pa.C.S. § 4103(a) (relating to promulgation of vehicle equipment standards) states that "[t]he department shall promulgate vehicle equipment standards for vehicles, equipment and devices required under this part." Section 4551(a) of 75 Pa.C.S. (relating to safety regulations) states, in pertinent part, "[r]egulations shall be promulgated by the department governing the safe design, construction, equipment and operation of vehicles engaged in the transportation of school children." Finally, under 75 Pa.C.S. § 6103 (relating to promulgation of rules and regulations by department), the department has broad rulemaking authority to promulgate, consistent with and in furtherance of 75 Pa.C.S., rules and regulations in accordance with which the department shall carry out its responsibilities and duties.

Background and Need for the Amendments

Section 171.58 requires that the interior of the school bus be free of unnecessary projections likely to cause injury. The Pennsylvania State Police (PSP) has interpreted this section to

prohibit mid-cabin cameras that are not a flush-mount design. Because of this interpretation, the Pennsylvania School Bus Association (PSBA) petitioned the Secretary of Transportation for a waiver of § 171.58 to allow school buses with mid-cabin cameras to pass inspection so long as they met certain safety requirements. Under 1 Pa. Code § 35.18 (relating to petitions for issuance, amendment, waiver or deletion of regulations), a petition may be filed for the issuance, amendment, waiver or repeal of a regulation. On August 18, 2021, the Secretary of Transportation granted the petition for the waiver of § 171.58. The waiver has been extended numerous times and will remain in effect until 2028.

The department hereby amends the current regulation to make clear that mid-cabin cameras are permitted, provided they meet certain safety requirements. Mid-cabin cameras play an important part in ensuring the safety of students in the event of a rollover crash, as well as ensure the security of the school bus through video surveillance. The department has been approached by several individuals in the school bus industry who have requested this proposed regulation to clarify that mid-cabin cameras are permitted on a school bus. School districts typically require school bus contractors to install and maintain mid-cabin cameras for student safety purposes. Schools often require mid-cabin cameras for complete coverage. Hundreds of mid-cabin cameras have been installed in school buses in this Commonwealth over a period of many years. According to the PSBA membership, more than 1,189 school buses were reported to be outfitted with mid-cabin cameras. This final-form rulemaking will benefit all passengers of school buses in this Commonwealth as well as the school bus companies and school districts that rely on mid-cabin cameras to maintain the safety of the school students by providing clarity on the requirements for mid-cabin cameras on school buses. There is potential for injury if the mid-

cabin camera is not properly placed or does not have impact-resistant parts or has sharp edges. This regulation ensures that the mid-cabin camera is installed safely in the school bus to promote the safety and security of school students on the school bus.

Description of the Final Rulemaking

This final-form rulemaking creates an exception to the requirement that every school bus be free of unnecessary projections likely to cause injury. The exception permits the installation of a mid-cabin camera with certain safety requirements. The safety requirements of § 171.58(b) are as follows: (1) require the mid-cabin camera to be mounted to the ceiling directly over a seatback and as close to the wall or wire chase of the school bus as reasonably possible, (2) prohibit the mid-cabin camera from being installed within the aisle of the bus, (3) require the mid-cabin camera to be flush mounted, or if protruding, have no sharp edges, and (4) require the mid-cabin camera to have impact-resistant lenses and other transparent parts.

Description of the Amendments to the Regulation made from Proposed Stage

There are no changes from the proposed stage to the final-form rulemaking. The department's final-form Annex A is identical to the proposed Annex A published at 56 Pa.B. 3321 (June 6, 2026).

Fiscal Impact

This final-form rulemaking does not impose new costs on the department because the department is not the subject of the regulation and is not the entity conducting the inspections. The entity in charge of inspections is the PSP. The PSP, the school bus manufacturers, school districts that own school buses and school bus companies are not newly impacted as these

entities are already complying with the existing waiver, which includes the same safety requirements for mid-cabin cameras as this final-form rulemaking. School bus manufacturers may incur minor costs if they decide to install new mid-cabin cameras; however, the additional financial impact is expected to be minimal and the installation of the mid-cabin cameras is entirely optional.

Summary and Response to Comments

Notice of the proposed rulemaking was published at 56 Pa.B. 3321 (June 6, 2026). Publication was followed by a 30-day public comment period. The department received 12 comments from various school bus companies, a State Certified School Bus Instructor, and a vendor and supplier of school bus camera systems, as well as the PSBA. All public commentators supported the proposed regulation and requested or encouraged the department to promulgate the regulation. On August 5, 2026, the Independent Regulatory Review Commission (IRRC) as part of its review of the proposed rulemaking under the Regulatory Review Act (71 P.S. §§ 741.10745.15), stated that IRRC had no objections, comments or recommendations on the proposed rulemaking. The department did not receive any comments from the Senate and House Transportation Committees as part of their review of the proposed rulemaking under the Regulatory Review Act. The department has taken the public comments into consideration in this final-form rulemaking as follows.

Public Comments

Comment: The department received 7 form letters from various public commentators, which stated the following: “I support PennDOT’s proposed regulation permitting mid-cabin cameras

on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation."

Response: The department thanks these commentators and agrees that the regulation provides needed clarity and should be adopted as published on June 6, 2026, as proposed rulemaking.

Comment: The department received the following comment from Walter and Nancy Jane Garing of Garing Enterprises LLC: "I support PennDOT's proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. It also provides insight to parents, guardians, and sometimes local and state law enforcement agencies. With the many miles school buses travel daily and the number of students a driver is responsible for, Mid-Cabin cameras provide a less stressful and safer ride, allowing the driver to concentrate on road conditions and other drivers using the highway. We have found that student discipline has been reduced when cameras are installed inside the bus as students are aware that "BIG BROTHER" is watching them. With the positioning and wide angle of the camera, cameras sometimes catch infractions of drivers passing the bus illegally. The proposed regulation provides much needed clarity for the use of Mid-Cabin cameras and should be adopted. I encourage PennDOT to finalize the regulation. After all, school buses are transporting the future of our country and SAFETY, SAFETY, SAFETY is the name of the game".

Response: The department thanks this commentator and agrees that the regulation provides needed clarity and should be adopted as published as proposed rulemaking. The department also

appreciates this commentator's concern for safety, which the department believes this final-form regulation promotes.

Comment: Timothy McIlwain, the President of McIlwain School Bus Lines, Inc., submitted the following comment: "I am writing today as a school bus contractor in Cambria and Somerset Counties. I am a third-generation owner/operator. My business began in 1947. I support PennDOT's proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation. This will help school District's, Contractors and the community in which we serve. Please consider adopting mid-cabin cameras on school buses for the safety and security of the children we transport. Thank you for your consideration."

Response: The department thanks this commentator and agrees that the regulation provides needed clarity and should be adopted as published as proposed rulemaking.

Comment: Staci Henderson, the Supervisor of Transportation for Bucks County Intermediate Unit, submitted the following comment: "I strongly support PennDOT's proposed regulation permitting the use of mid-cabin cameras on Pennsylvania school buses. As a school transportation professional, I have seen firsthand the value these cameras provide in promoting student safety, protecting drivers and aides, and assisting school administrators with investigating incidents accurately and fairly. Mid-cabin cameras provide an objective record of events, helping to resolve concerns quickly while reducing misunderstandings and protecting everyone involved. These cameras also serve as a deterrent to unsafe behavior, support accountability, and contribute

to a safer environment for students and staff. They have become an essential tool in modern pupil transportation and have proven to be invaluable in protecting students, employees, school districts, and contractors. PennDOT's proposed regulation provides clear, reasonable safety requirements while allowing school transportation providers to continue using technology that enhances safety and security."

Response: The department thanks this commentator and agrees that the regulation provides clear and reasonable safety requirements and should be adopted as published on June 6,2026, as proposed rulemaking.

Comment: The department received the following comment from Riley Hayes, Sales Operations Manager for Radio Engineering Industries, Inc. (REI®): "REI® supports PennDOT's proposed regulation permitting the use of mid-cabin cameras on Pennsylvania school buses. With more than 30 years of experience supplying video surveillance systems to school districts across the country, REI understands the important role these systems play in enhancing student transportation safety. The proposed regulation aligns with installation practices already accepted in many other states. As a manufacturer and supplier of school bus video surveillance systems used throughout North America, REI has seen firsthand that interior camera systems have become an essential component of student transportation safety. Mid-cabin cameras provide objective documentation of incidents involving student behavior, driver interactions, student misconduct, vandalism, emergency events, and false allegations. They protect students, support drivers, assist school administrators, and provide valuable evidence when investigating complaints or accidents. The proposed regulation appropriately balances these safety benefits with the need to ensure that installed equipment does not create an additional hazard within the

passenger compartment. The requirements regarding ceiling mounting, placement outside of the aisle, flush or smooth installation, and the use of impact-resistant materials establish practical installation standards while allowing schools and manufacturers the flexibility to utilize modern camera technology. Replacing the current waiver process with a permanent regulation will provide much-needed consistency for school districts, contractors, manufacturers, and inspectors while eliminating the need to rely on temporary waivers for a widely accepted safety technology. For these reasons, REI respectfully supports the adoption of the proposed regulation and encourages PennDOT to finalize it."

Response: The department thanks this commentator and agrees that the regulation provides needed consistency and should be adopted as published on June 6, 2026, as proposed rulemaking.

Comment: The department received the following Comment from Gerry Wosewick, Executive Director of the Pennsylvania School Bus Association (PSBA): "**Mid-Cabin Cameras Are an Important Student Safety and Security Tool Which are Often Required by School Districts.** PSBA supports PennDOT's proposed rulemaking because mid-cabin cameras are an important student safety and security tool. Drivers must safely operate the vehicle while also remaining aware of activity in the passenger compartment. Mid-cabin cameras help school bus contractors, school districts, and school administrators better understand what occurs inside the bus and serve several practical purposes. Mid-cabin cameras are used to observe and record behavioral issues and deter unsafe or disruptive behavior, including bullying. Mid-cabin cameras capture more activity inside the bus than cameras positioned only at the front or rear of the bus and provide

evidence that can help determine what did, or did not, happen when concerns are raised about student conduct, driver conduct, vandalism, bullying, injuries, or other incidents on the bus.

Many school districts recognize the benefits of mid-cabin cameras and contractually require school bus contractors to install and maintain in-bus camera systems for this reason. Districts recognize that school districts, contractors, drivers, and aides need practical tools to help maintain safety and security during daily transportation. It is also beneficial for school districts to have reliable information when concerns are raised about incidents occurring on a school bus.

The Proposed Rule Appropriately Formalizes the Existing Waiver Framework, Which Has Proven Effective in Allowing Mid-Cabin Cameras While Maintaining Safety

PennDOT's proposed rulemaking appropriately formalizes the existing waiver framework, providing certainty while preserving a tested method of allowing mid-cabin cameras on school buses subject to appropriate safety requirements. This issue is not new to PennDOT or the school transportation community. PSBA first petitioned for relief in the form of a waiver in 2021 because mid-cabin cameras were being treated as prohibited interior projections under 67 Pa. Code § 171.58(1). At that time, PennDOT recognized the importance of mid-cabin cameras in school buses and treated them as necessary projections by granting the initial waiver along, with successive annual extensions.

The waiver process allowed school buses with existing mid-cabin cameras to remain in service while a more permanent solution was explored. The proposed rule does not create new or untested requirements. Instead, it incorporates the same safety requirements that PennDOT has already applied through the waiver framework. That framework has been in place for multiple

years and has proven effective in allowing mid-cabin cameras on school buses while maintaining student safety. PennDOT is therefore appropriately formalizing a framework that has already been used to balance student safety, operational needs, and regulatory clarity.

The Proposed Installation Requirements Will Promote Safety and Consistent Expectations

PSBA also supports the specific installation standards in the proposed rule. By continuing the existing safety conditions from the waiver framework, the proposed rule ensures that mid-cabin cameras may be installed only in a manner that addresses passenger safety. 67 Pa. Code § 171.58(1) is intended to prevent unnecessary protrusions inside the school bus that are likely to cause injury. PSBA understands the intent of that regulation and agrees that the proposed rule appropriately balances the safety concerns associated with interior projections against the safety benefits of mid-cabin cameras.

The proposed rule addresses that balance directly by requiring cameras to: 1) be mounted directly over a seatback; 2) be mounted as close to the wall or wire chase as reasonably possible; 3) have no sharp edges; and 4) be made with impact-resistant materials. Clear standards will also promote consistent expectations for contractors, school districts, regulators, and inspectors. Those responsible for operating, installing, and inspecting school buses will understand what is permitted before a camera is installed and how compliance will be evaluated after installation. Formalizing the safety requirements from the waiver framework will create a consistent standard for all parties involved.

PSBA appreciates PennDOT's work on this proposed rulemaking and supports the proposed amendment to 67 Pa. Code § 171.58. Mid-cabin cameras are an important tool for school bus

contractors, school districts, drivers, administrators, and parents because they help provide a clearer understanding of what occurs inside a school bus. The proposed rule recognizes the value of that technology while preserving the appropriate safety protections. It allows school buses to use mid-cabin cameras only when they are installed in a manner designed to avoid unnecessary risks. PSBA agrees with that approach.

For several years, this issue has been addressed through PennDOT's waiver framework. That framework has allowed school buses with mid-cabin cameras to remain in service while applying safety conditions that are now reflected in the proposed regulation. Moving those requirements into regulation will provide clear expectations for school bus contractors, school districts, regulators, and inspectors. For these reasons, PSBA supports the proposed rulemaking and urges PennDOT to adopt the amendment to 67 Pa. Code § 171.58 as proposed."

Response: The department thanks the PSBA and agrees that the regulation provides needed clarity and should be adopted as proposed.

Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), on May 27, 2026, the department submitted a copy of this proposed rulemaking and a copy of a Regulatory Analysis Form to the Independent Regulatory Review Commission (IRRC) and to the chairpersons of the Transportation Committee of the Senate and to the chairpersons of the Transportation Committee of the House of Representatives. A copy of this material is available to the public upon request.

In compliance with section 5(c) of the Regulatory Review Act (71 P.S. § 745.5(c)), the department also provided IRRC, the Senate and House Transportation Committees with copies

of comments received as well as other documents when requested. The department received no comments from the Senate and House Transportation Committees and IRRC indicated that they had no comments. In preparing the final-form rulemaking, the department considered all comments from the public.

Under section 5.1(a) of the Regulatory Review Act (71 P.S. § 745.5a(a), on September 30, 2026, the department delivered this final-form rulemaking to IRRC, the Senate and House Transportation Committees. Under section 5.1(j.2) of the Regulatory Review Act (71 P.S. § 745.5a(j.2)), on _____, 2026, the final-form rulemaking was approved by the Senate Transportation Committee. On _____, 2026, the final-form rulemaking was deemed approved by the House Transportation Committee. Under section 5(g) of the Regulatory Review Act, this final-form rulemaking was deemed approved by IRRC on _____, 2026.

Sunset Date

The department is not establishing a sunset date for these regulations. The department, however, will continue to closely monitor these regulations for their effectiveness.

Contact Person

Additional information may be obtained by contacting Dios Arroyo, Director, Department of Transportation, Bureau of Driver Licensing, P.O. Box 68676, Harrisburg, PA 17106-8676, (717) 705-6044, or by email at darroyo@pa.gov.

Findings

The department of Transportation finds that:

(1) Public notice of the proposed rulemaking was given under sections 201 and 202 of the act of July 31, 1968 (P.L. 769, No. 240) (45 P.S. §§ 1201 and 1202) and the regulations promulgated under those sections at 1 Pa. Code §§ 7.1 and 7.2.

(2) A public comment period was provided as required by law and all public comments were considered in drafting this final-form rulemaking.

(3) This final-form rulemaking does not include any amendments, thus it does not expand the scope of the proposed rulemaking published at 56 Pa.B. 3321 (June 6, 2026).

(4) This final-form rulemaking is necessary and appropriate for administering and enforcing theVehicle Code.

Order

The department therefore ORDERS:

(A) That the regulations of the department, 67 Pa. Code § 171.58 are amended to read as set forth in Annex A.

(B) The department shall submit this order and Annex A to the Office of Attorney General and the Office of General Counsel for approval as required by law.

(C) The department shall certify the final-form regulation and deposit it with the Legislative Reference Bureau as required by law.

(D) The regulations shall take effect immediately upon publication in the *Pennsylvania Bulletin*.

MICHAEL CARROLL,

Secretary

Chapter 171.58 (18-491) Comments

Date Received	Commentor and Contact Info	Comment(s)
6/9/2026	Josh Blackmun, President Eagle Wireless Josh@eaglewireless.us PO Box 404 Downingtown, PA 19335 610.637.3863	I am writing in as a vendor and supplier for school bus cameras systems. I support PennDOT's proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation.
6/9/2026	Joseph Muccio mucciotrans@gmail.com	I support PennDOT's proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation.
6/12/2026	Walter and Nancy Jane Garing wjnjgbus@gmail.com Garing Enterprises LLC WJNJG 233Melody Road Honesdale, PA 18431-2334	I support PennDOT's proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. It also provides insight to parents, guardians, and sometimes local and state law enforcement agencies. With the many miles school buses travel daily and the number of students a driver is responsible for, Mid-Cabin cameras provide a less stressful and safer ride, allowing the driver to concentrate on road conditions and other drivers using the highway. We have found that student discipline has been reduced when cameras are installed inside the bus as students are aware that "BIG BROTHER" is watching them. With the positioning and wide angle of the camera, cameras sometimes catch infractions of drivers passing the bus illegally. The proposed regulation provides much needed clarity for the use of Mid-Cabin cameras and should be adopted. I encourage PennDOT to finalize the regulation. After all, school buses are transporting the future of our country and SAFETY, SAFETY, SAFETY is the name of the game.
7/1/2026	Bob Nolan Fleet/Facility Manager Transportation Services Inc. 210 Schoolhouse Road Sounderton, PA 18964 Cell: 267.446.6016 bob@hagey.com Phone: 215.723.4613	I support PennDOT's proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation.
7/1/2026	Timothy McIlwain President McIlwain School Bus Lines, Inc. tim@mcilwainbus.com	I am writing today as a school bus contractor in Cambria and Somerset Counties. I am a third-generation owner/operator. My business began in 1947. I support PennDOT's proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation. This will help school District's, Contractors and the community in which we serve. Please consider adopting mid-cabin cameras on school buses for the safety and security of the children we transport. Thank you for your consideration.

7/1/2026	Danette Iacopino danette@abctransit.com	I support PennDOT’s proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation.
7/1/2026	Staci Henderson Supervisor of Transportation Bucks County Intermediate Unit 705 N. Shady Retreat Road Doylestown, PA 18901 Tel: 215 348 2940 Extension 1260 SHenderson@Bucksiu.org	I strongly support PennDOT's proposed regulation permitting the use of mid-cabin cameras on Pennsylvania school buses. As a school transportation professional, I have seen firsthand the value these cameras provide in promoting student safety, protecting drivers and aides, and assisting school administrators with investigating incidents accurately and fairly. Mid-cabin cameras provide an objective record of events, helping to resolve concerns quickly while reducing misunderstandings and protecting everyone involved. These cameras also serve as a deterrent to unsafe behavior, support accountability, and contribute to a safer environment for students and staff. They have become an essential tool in modern pupil transportation and have proven to be invaluable in protecting students, employees, school districts, and contractors. PennDOT's proposed regulation provides clear, reasonable safety requirements while allowing school transportation providers to continue using technology that enhances safety and security.
7/2/2026	Michael Hope State Certified School Bus Instructor michael@abctransit.com	I support PennDOT’s proposed regulation permitting mid-cabin cameras on school buses. These cameras are a vital tool for school bus contractors, to safeguard school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation.
7/2/2026	Sue Roenigk sroenigk@wlroenigk.com	I support PennDOT’s proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation.

7/2/2026	Gerry Wosewick, Executive Director Pennsylvania School Bus Association 908 N 2nd Street Harrisburg, PA 17102 gerry@paschoolbus.org 717.975.1951 x117	Mid-Cabin Cameras Are an Important Student Safety and Security Tool Which are Often Required by School Districts PSBA supports PennDOT's proposed rulemaking because mid-cabin cameras are an important student safety and security tool. Drivers must safely operate the vehicle while also remaining aware of activity in the passenger compartment. Mid-cabin cameras help school bus contractors, school districts, and school administrators better understand what occurs inside the bus and serve several practical purposes. Mid-cabin cameras are used to observe and record behavioral issues and deter unsafe or disruptive behavior, including bullying. Mid-cabin cameras capture more activity inside the bus than cameras positioned only at the front or rear of the bus and provide evidence that can help determine what did, or did not, happen when concerns are raised about student conduct, driver conduct, vandalism, bullying, injuries, or other incidents on the bus. Many school districts recognize the benefits of mid-cabin cameras and contractually require school bus contractors to install and maintain in-bus camera systems for this reason. Districts recognize that school districts, contractors, drivers, and aides need practical tools to help maintain safety and security during daily transportation. It is also beneficial for school districts to have reliable information when concerns are raised about incidents occurring on a school bus. The Proposed Rule Appropriately Formalizes the Existing Waiver Framework, Which Has Proven Effective in Allowing Mid-Cabin Cameras While Maintaining Safety PennDOT's proposed rulemaking appropriately formalizes the existing waiver framework, providing certainty while preserving a tested method of allowing mid-cabin cameras on school buses subject to appropriate safety requirements. This issue is not new to PennDOT or the school transportation community. PSBA first petitioned for relief in the form of a waiver in 2021 because mid-cabin cameras were being treated as prohibited interior projections under 67 Pa. Code § 171.58(1). At that time, PennDOT recognized the importance of mid-cabin cameras in school buses and treated them as necessary projections by granting the initial waiver along, with successive annual extensions. The waiver process allowed school buses with existing mid-cabin cameras to remain in service while a more permanent solution was explored. The proposed rule does not create new or untested requirements. Instead, it incorporates the same safety requirements that PennDOT has already applied through the waiver framework. That framework has been in place for multiple years and has proven effective in allowing mid-cabin cameras on school buses while maintaining student safety. PennDOT is therefore appropriately formalizing a framework that has already been used to balance student safety, operational needs, and regulatory clarity. The Proposed Installation Requirements Will Promote Safety and Consistent Expectations PSBA also supports the specific installation standards in the proposed rule. By continuing the existing safety

7/6/2026	Riley Hays Sales Operations Manager Radio Engineering Industries, Inc. 6534 L Street Omaha, NE 68117 sent by Jason Coleman jcoleman@radioeng.com	Radio Engineering Industries, Inc. (REI®) supports PennDOT's proposed regulation permitting the use of mid-cabin cameras on Pennsylvania school buses. With more than 30 years of experience supplying video surveillance systems to school districts across the country, REI understands the important role these systems play in enhancing student transportation safety. The proposed regulation aligns with installation practices already accepted in many other states. As a manufacturer and supplier of school bus video surveillance systems used throughout North America, REI has seen firsthand that interior camera systems have become an essential component of student transportation safety. Mid-cabin cameras provide objective documentation of incidents involving student behavior, driver interactions, student misconduct, vandalism, emergency events, and false allegations. They protect students, support drivers, assist school administrators, and provide valuable evidence when investigating complaints or accidents. The proposed regulation appropriately balances these safety benefits with the need to ensure that installed equipment does not create an additional hazard within the passenger compartment. The requirements regarding ceiling mounting, placement outside of the aisle, flush or smooth installation, and the use of impact-resistant materials establish practical installation standards while allowing schools and manufacturers the flexibility to utilize modern camera technology. Replacing the current waiver process with a permanent regulation will provide much-needed consistency for school districts, contractors, manufacturers, and inspectors while eliminating the need to rely on temporary waivers for a widely accepted safety technology. For these reasons, REI respectfully supports the adoption of the proposed regulation and encourages PennDOT to finalize it.
7/7/2026	John Dannenbaum Regional Sales Manager, School Bus - Northeast US & Eastern Canada John.dannenbaum@safefleet.net 445.776.4906	I support PennDOT’s proposed regulation permitting mid-cabin cameras on school buses. Mid-cabin cameras are an important safety and security tool for school bus contractors, school districts, students, and drivers. The proposed regulation provides needed clarity and should be adopted. I encourage PennDOT to finalize the regulation. Safe Fleet/Seon is a leading supplier to the school bus industry with many customers in North America and in Pennsylvania. We have outfitted many of the bus contractors and school districts with our camera systems, including mid-cabin cameras. This provides the added measure of security an safety for the students, driver, and passengers on those buses.

Annex A

TITLE 67. TRANSPORTATION

PART I. DEPARTMENT OF TRANSPORTATION

Subpart A. VEHICLE CODE PROVISIONS

ARTICLE VII. VEHICLE CHARACTERISTICS

CHAPTER 171. SCHOOL BUSES AND SCHOOL VEHICLES

Subchapter C. SCHOOL BUS BODY STANDARDS

§ 171.58. Interior.

(a) *Requirements.* The requirements for the interior of school buses are as follows:

(1) **[The]** **Except as provided in subsection (b), the** interior of every school bus shall be free of unnecessary projections likely to cause injury. This standard requires inner lining on ceilings and walls. If the ceiling is constructed so as to contain lapped joints, the forward panel shall be lapped by the rear panel, and exposed edges shall be beaded, hemmed, flanged or otherwise treated to minimize sharp edges.

* * * * *

(6) The requirements for air-conditioning units are as follows:

* * * * *

(iii) This paragraph does not prohibit the installation of air-conditioning units in locations other than those described in subparagraph (ii). Air-conditioning units may be installed in other locations if labeled as described in subparagraph (i).

(b) *Mid-cabin camera*. The interior of a school bus may be equipped with a mid-cabin camera, subject to the following requirements:

(1) A mid-cabin camera shall be mounted to the ceiling directly over a seatback and as close to the wall or wire chase of the school bus as reasonably possible.

(2) A mid-cabin camera may not be installed within the aisle of the bus.

(3) A mid-cabin camera shall be flush-mounted or, if protruding, must have no sharp edges.

(4) The lenses and other transparent parts of a mid-cabin camera shall be constructed of impact-resistant materials.

COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

September 30, 2026

The Honorable George D. Bedwick, Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
555 Walnut Street, Suite 804
Harrisburg, Pennsylvania 17101

Re: Final-Form Rulemaking
Department of Transportation
18-491 — 67 Pa. Code Chapter 171, § 171.58
Mid-Cabin Cameras

Dear Chairman Bedwick:

Enclosed is a copy of the final-form regulation package of the Department of Transportation for the amendment of 67 Pa. Code Ch. 171, § 171.58, Mid-Cabin Cameras.

The Department will be happy to provide whatever information the Independent Regulatory Review Commission may require during the course of its review of the rulemaking.

Very truly yours,

Kristin Kayer

Kristin M. Kayer,
Regulatory Counsel

From:	Ritchie, Nolan
To:	Kayer, Kristin
Cc:	Trently, Nolan; Spotts, Jeffrey M; Lobel, Jodi; Domoto, Aaron; Edwards, Victoria; Fertenbaugh, Seth
Subject:	Final-Form Rulemaking # 18-491 - 67 Pa. Code Chapter 171, § 171.58
Date:	Wednesday, September 30, 2026 12:08:58 PM
Attachments:	image001.png

Good Afternoon:

This email is to confirm receipt of the final-form rulemaking, #18-484, on behalf of the Majority Chair of the Senate Transportation Committee.

Let me know if you have any questions.

RECEIVED
Independent Regulatory Review Commission
September 30, 2026

Nolan R. Ritchie, M.P.A.
Executive Director, Senate Transportation Committee
State Senator Judy Ward – 30th District
362 Main Capitol Building
Harrisburg, PA 17112
(717) 787-5490 | Direct: 7-0336
nritchie@pasen.gov

From: Kayer, Kristin <kkayer@pa.gov>
Sent: Wednesday, September 30, 2026 8:41 AM
To: Ward, Senator Judy <jward@pasen.gov>; Ritchie, Nolan <nritchie@pasen.gov>
Cc: Trently, Nolan <ntrently@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Lobel, Jodi <jlobel@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Edwards, Victoria <victoredwa@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: Final-Form Rulemaking # 18-491 - 67 Pa. Code Chapter 171, § 171.58
Importance: High

◉ CAUTION : External Email ◉

This Message Is From an External Sender
This message came from outside your organization.

Good morning,

Please see the attached rulemaking documents for the final-form rulemaking – 67 Pa. Code Chapter 171, § 171.58, Mid-Cabin Cameras (Agency #18-491). All rulemaking documents, including cover letter, are included in the attached file. Please confirm your receipt of this email by responding with an email confirmation.

Thank you,

Kristin

Kristin M. Kayer | Assistant Counsel
Governor's Office of General Counsel
Department of Transportation | Office of Chief Counsel
400 North Street | P.O. Box 8212 | Harrisburg, PA 17105-8212
Phone: 717.787.5299
kkayer@pa.gov | www.penndot.pa.gov

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Independent Regulatory Review Commission
September 30, 2026

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RECEIVED
Independent Regulatory Review Commission
September 30, 2026

From: Josiah Shelly
To: Kayer, Kristin
Subject: RE: [EXTERNAL]: Final-Form Rulemaking # 18-491 - 67 Pa. Code Chapter 171, § 171.58
Date: Wednesday, September 30, 2026 9:22:33 AM
Attachments: image001.png

Confirmed.

From: Kayer, Kristin <kkayer@pa.gov>
Sent: Wednesday, September 30, 2026 8:43 AM
To: Kerry Benninghoff <Kbenning@pahousegop.com>; Josiah Shelly <Jshelly@pahousegop.com>
Cc: Trently, Nolan <ntrently@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Lobel, Jodi <jlobel@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Edwards, Victoria <victoredwa@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: [EXTERNAL]: Final-Form Rulemaking # 18-491 - 67 Pa. Code Chapter 171, § 171.58
Importance: High

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Please see the attached rulemaking documents for the final-form rulemaking – 67 Pa. Code Chapter 171, § 171.58, Mid-Cabin Cameras (Agency #18-491). All rulemaking documents, including cover letter, are included in the attached file. Please confirm your receipt of this email by responding with an email confirmation.

Thank you,

Kristin

Kristin M. Kayer | Assistant Counsel
Governor's Office of General Counsel
Department of Transportation | Office of Chief Counsel
400 North Street | P.O. Box 8212 | Harrisburg, PA 17105-8212
Phone: 717.787.5299
kkayer@pa.gov | www.penndot.pa.gov

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From:	Gensimore, Justin
To:	Kayer, Kristin; Flynn, Senator Marty
Cc:	Trently, Nolan; Spotts, Jeffrey M; Lobel, Jodi; Domoto, Aaron; Edwards, Victoria; Fertenbaugh, Seth
Subject:	RE: Final-Form Rulemaking # 18-491 - 67 Pa. Code Chapter 171, § 171.58
Date:	Wednesday, September 30, 2026 11:53:55 AM
Attachments:	image001.png

Good morning,

On behalf of Senator Flynn, please allow this email to serve as confirmation of receipt of the attached rule making document(s).

RECEIVED
Independent Regulatory
Review Commission
September 30, 2026

Thank you.

Warm regards,

Justin M. Gensimore
Executive Director | Senate Transportation Committee
Policy Director | Office of Senator Marty Flynn
Room 543 | Main Capitol | Harrisburg | PA | 17120
(O) 717.787.6481 | (E) Justin.Gensimore@PASenate.com

From: Kayer, Kristin <kkayer@pa.gov>
Sent: Wednesday, September 30, 2026 8:45 AM
To: Flynn, Senator Marty <marty.flynn@pasenate.com>; Gensimore, Justin <Justin.Gensimore@pasenate.com>
Cc: Trently, Nolan <ntrently@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Lobel, Jodi <jlobel@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Edwards, Victoria <victoredwa@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: Final-Form Rulemaking # 18-491 - 67 Pa. Code Chapter 171, § 171.58
Importance: High

■ EXTERNAL EMAIL ■

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Thank you,

Kristin

RECEIVED
Independent Regulatory
Review Commission
September 30, 2026

Kristin M. Kayer | Assistant Counsel
Governor's Office of General Counsel
Department of Transportation | Office of Chief Counsel
400 North Street | P.O. Box 8212 | Harrisburg, PA 17105-8212
Phone: 717.787.5299
kkayer@pa.gov | www.penndot.pa.gov

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This message and any attachment may contain privileged or confidential information intended solely for the use of the person to whom it is addressed. If the reader is not the intended recipient then be advised that forwarding, communicating, disseminating, copying or using this message or its attachments is strictly prohibited. If you receive this message in error, please notify the sender immediately and delete the information without saving any copies.

From:	Wagonseller, Kyle
To:	Kayer, Kristin; Neilson,Ed
Cc:	Trently, Nolan; Spotts, Jeffrey M; Lobel, Jodi; Domoto, Aaron; Edwards, Victoria; Fertenbaugh, Seth
Subject:	RE: Final-Form Rulemaking # 18-491 - 67 Pa. Code Chapter 171, § 171.58
Date:	Wednesday, September 30, 2026 8:46:38 AM
Attachments:	image002.png image003.png

Received.

RECEIVED
Independent Regulatory
Review Commission
September 30, 2026

From: Kayer, Kristin <kkayer@pa.gov>
Sent: Wednesday, September 30, 2026 8:39 AM
To: Neilson, Ed <ENeilson@pahouse.net>; Wagonseller, Kyle <KWagonse@pahouse.net>
Cc: Trently, Nolan <ntrently@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Lobel, Jodi <jlobel@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Edwards, Victoria <victoredwa@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: Final-Form Rulemaking # 18-491 - 67 Pa. Code Chapter 171, § 171.58
Importance: High

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Thank you,

Kristin

Kristin M. Kayer | Assistant Counsel
Governor's Office of General Counsel
Department of Transportation | Office of Chief Counsel
400 North Street | P.O. Box 8212 | Harrisburg, PA 17105-8212
Phone: 717.787.5299
kkayer@pa.gov | www.penndot.pa.gov