

<h2 style="margin: 0;">Regulatory Analysis Form</h2> <p style="margin: 0;">(Completed by Promulgating Agency)</p> <p style="margin: 0;">(All Comments submitted on this regulation will appear on IRRC's website)</p>	<p style="margin: 0;"><i>INDEPENDENT REGULATORY REVIEW COMMISSION</i></p> <p style="margin: 10px 0 0 0;">RECEIVED</p> <p style="margin: 0;">Independent Regulatory Review Commission</p> <p style="margin: 0;">May 27, 2026</p>
<p>(1) Agency Department of Transportation</p>	<p>IRRC Number: 3488</p>
<p>(2) Agency Number: Identification Number: 18-491</p>	
<p>(3) PA Code Cite: 67 Pa. Code Chapter 171.58</p>	
<p>(4) Short Title: Mid-Cabin Cameras</p>	
<p>(5) Agency Contacts (List Telephone Number and Email Address):</p> <p>Primary Contact: Diosdado Arroyo, Director Bureau of Driver Licensing P.O. Box 68676 Harrisburg, Pennsylvania 17106-8676 (717) 787-4701 DARROYO@pa.gov</p> <p>Secondary Contact: Angelia Gillis, Division Manager Driver Safety Division, Bureau of Driver Licensing P.O. Box 68676 Harrisburg, Pennsylvania 17106-8676 (717) 346-1907 agillis@pa.gov</p>	
<p>(6) Type of Rulemaking (check applicable box):</p> <p><input checked="" type="checkbox"/> Proposed Regulation</p> <p><input type="checkbox"/> Final Regulation</p> <p><input type="checkbox"/> Final Omitted Regulation</p>	<p><input type="checkbox"/> Emergency Certification Regulation;</p> <p style="margin-left: 20px;"><input type="checkbox"/> Certification by the Governor</p> <p style="margin-left: 20px;"><input type="checkbox"/> Certification by the Attorney General</p>
<p>(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)</p> <p>Currently, § 171.58(1) 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 proposed 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</p>	

passengers in the event of a rollover crash.

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

This proposed 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 proposed 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 proposes this amendment to the current 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 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 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 proposed 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 busses. 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 proposed 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, as 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 proposed regulations that would ensure the safety of students in roll over crashes. By adding clarity, the proposed 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 proposed 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.

(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 proposed regulatory amendment will be school bus companies, which would now be regulatorily permitted to place cameras within the interior cabin of the bus for safety and security purposes. Those impacted by this proposed 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. 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 proposed 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 proposed regulation. The cost of compliance with the proposed 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 Pennsylvania State Police, 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 proposed 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 proposed 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 proposed 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 proposed regulation. The PSP conducts the school bus inspections and will have to ensure that the school bus complies with the proposed regulation. Since 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 and/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 and/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 proposed 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	Inspection for this FY do not begin until May 2026

(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 proposed 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 proposed amendment to the 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 proposed 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: 2027-2028
- 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.

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU
(Pursuant to Commonwealth Documents Law)

RECEIVED

Independent Regulatory
Review Commission

May 27, 2026

DO NOT WRITE IN THIS SPACE

<p>Copy below is hereby approved as to form and legality. Attorney General</p> <p>Katherine P. Zimmermann <small>Digitally signed by Katherine P. Zimmermann Date: 2026.05.04 10:46:17 -04'00'</small></p> <p>BY: _____ (DEPUTY ATTORNEY GENERAL)</p> <p><u>May 4, 2026</u> DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable Copy not approved. Objections attached.</p>	<p>Copy below is here by certified to be a true and correct copy of a document issued, prescribed or promulgated by:</p> <p><u>Department of Transportation</u> _____ (AGENCY)</p> <p>DOCUMENT/FISCAL NOTE NO. <u>18-491</u></p> <p>DATE OF ADOPTION: _____</p> <p>BY: <u></u> _____ Secretary TITLE _____ (EXECUTIVE OFFICER, CHAIRMAN OR SECRETARY)</p>	<p>Copy below is hereby approved as to form and legality. Executive or Independent Agencies.</p> <p><u>Cynthia K. Montgomery</u> <small>Digitally signed by Cynthia K. Montgomery DN: cn=Cynthia K. Montgomery, o, ou, email=cymontgome@pa.gov, c=US Date: 2026.04.06 09:00:22 -04'00'</small></p> <p>BY: _____ (Deputy General Counsel, OGC) (Chief Counsel, Independent Agency) (Strike inapplicable title)</p> <p><u>April 6, 2026</u> DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable. No Attorney General approval or objection within 30 days after submission.</p>
--	--	--

PROPOSED RULEMAKING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION
DRIVER VEHICLE SERVICES

67 PA. CODE CHAPTER 171
§ 171.58

MID-CABIN CAMERAS

The Pennsylvania Department of Transportation (department), proposes to amend 67 Pa. Code § 171.58 (relating to Interior) to read as set forth in Annex A. The proposed regulation 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

The amendment will be effective upon publication of the final-form rulemaking in the *Pennsylvania Bulletin*.

Statutory Authority

This proposed 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.

Background and Need for the Amendments

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 proposes this amendment to 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 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 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 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 proposed 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 busses. 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 Proposed Amendments

The proposed regulation 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 subsection (b) would: (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 and have no sharp edges; and (4) require the mid-cabin camera to have impact resistant lenses and other transparent parts.

Affected Individuals and Organizations

The proposed regulation will affect several groups, primarily school bus companies. The proposed regulation will regulatorily permit the installation of mid-cabin cameras for safety in the event of a school bus crash as well as security of the students on the school bus. Additionally, this change will impact school bus manufacturers, school bus organizations, and individual schools that own buses.

Fiscal Impact

This proposed regulation 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 Pennsylvania State Police. The Pennsylvania State Police, 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 proposed 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 and the installation of the mid-cabin cameras is entirely optional.

Paperwork Requirements

The proposed regulation does not impose any additional legal, accounting, or consulting procedures. It also does not require additional reporting, recordkeeping, or other paperwork, including copies of forms or reports for implementation.

Effective Date

The amendments will be effective upon publication of the final-form rulemaking in the *Pennsylvania Bulletin*.

Public Comments

Interested persons are invited to submit written comments, suggested edits, or objections regarding this proposed rulemaking to: Victoria P. Edwards, Regulatory Counsel, Office of Chief Counsel, Pennsylvania Department of Transportation, Commonwealth Keystone Building, 400 North Street, Harrisburg, Pennsylvania 17120-8212, RA-PDOCCPUBCOMMENTS@pa.gov, within 30 days of publication of this notice in the *Pennsylvania Bulletin*.

Contact Person

The contact person for this regulation is Dios Arroyo, Director, Pennsylvania Department of Transportation, Bureau of Driver Licensing P.O. Box 68676 Harrisburg, Pennsylvania 17106-8676, Telephone number (717) 705-6044; and e-mail address: darroyo@pa.gov.

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 House and Senate Transportation Committees. A copy of this material is available to the public upon request.

Under Section 5(g) of the Regulatory Review Act, IRRC may convey any comments, recommendations, or objections to the proposed regulations within 30 days of the close of the public comment period. The comments, recommendations or objections shall specify the regulatory review criteria in Section 5.2 of the Regulatory Review Act (71 P.S. § 745.5b) which have not been met. The Regulatory Review Act specifies detailed procedures for review prior to final publication of the rulemaking by the Department, the General Assembly, and the Governor.

Michael Carroll
Secretary of Transportation

ANNEX A

TITLE 67. TRANSPORTATION

CHAPTER 171. SCHOOL BUSES AND SCHOOL VEHICLES

Subchapter C. SCHOOL BUS BODY STANDARDS

SECTION 171.58 INTERIOR

§ 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.
- (2) Every school bus shall meet the requirements of FMVSS No. 302, as to the flammability of interior materials. See Appendix A.
- (3) Book racks or luggage racks are not permitted.
- (4) Interior radio/stereo speakers shall be of the flush mounted type. Exposed parts shall be treated to minimize sharp edges.

(5) The driver's area forward of the foremost padded barriers shall permit the mounting of required safety equipment and vehicle operating equipment.

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

(i) Persons installing air-conditioning units in school buses after the vehicle's original manufacture date shall install the equipment in accordance with manufacturer's specification and applicable FMVSS.

(ii) Interior ceiling-mounted air-conditioning units, mounted above the seats within the head protection zone or at the rear of the bus, shall be padded with materials meeting FMVSS No. 302 to an extent to ensure compliance with the head impact test requirements of FMVSS No. 222. See Appendix A.

(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) A mid-cabin camera shall have impact resistant lenses and other transparent parts.



COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL

May 27, 2026

David Sumner, Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, Pennsylvania 17101

Re: Proposed Rulemaking
18-491 — 67 Pa. Code Ch. 171.58
Mid-Cabin Cameras

Dear Mr. Sumner:

Enclosed please find a copy of the proposed regulatory package of the Department of Transportation for the amendment of 67 Pa. Code Ch. 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,

Victoria P. Edwards

Victoria P. Edwards
Regulatory Counsel

May 27, 2026

From: [Wagonseller, Kyle](#)
To: [Edwards, Victoria](#); [Neilson, Ed](#)
Cc: [Wagner, Teresa](#); [Trently, Nolan](#); [Spotts, Jeffrey M](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: RE: Proposed Rulemaking # 18-491 - 67 Pa. Code, Chapter 171.58
Date: Wednesday, May 27, 2026 12:17:11 PM
Attachments: [image002.png](#)
[image003.png](#)

Received. Thank you.



Kyle Wagonseller | Executive Director
House Transportation Committee
Majority Chairman Ed Neilson (D)
127 Irvis Office Building, Harrisburg, PA 17120
Office: 717-772-1786 | Cell: 717-982-1114
E-mail: kwagonse@pahouse.net

From: Edwards, Victoria <victoredwa@pa.gov>
Sent: Wednesday, May 27, 2026 7:44 AM
To: Neilson, Ed <ENeilson@pahouse.net>; Wagonseller, Kyle <KWagonse@pahouse.net>
Cc: Wagner, Teresa <tereswagne@pa.gov>; Trently, Nolan <ntrently@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Kayer, Kristin <kkayer@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: Proposed Rulemaking # 18-491 - 67 Pa. Code, Chapter 171.58
Importance: High

Good morning,

Please see the attached rulemaking documents for proposed rulemaking – 67 Pa. Code Chapter 171.58 Mid-Cabin Cameras (Agency #18-491). All rulemaking documents are included in the attached files. Please confirm your receipt of this email by responding with an email confirmation.

Thank you,

Victoria



Victoria P. Edwards | Assistant Chief 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
victoredwa@pa.gov | www.penndot.pa.gov

PRIVILEGED AND CONFIDENTIAL COMMUNICATION

The information transmitted is intended only for the person or entity to whom it is addressed and may contain

confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

RECEIVED

Independent Regulatory
Review Commission

May 27, 2026

May 27, 2026

From: [Josiah Shelly](#)
To: [Edwards, Victoria](#); [Kerry Benninghoff](#)
Cc: [Wagner, Teresa](#); [Trently, Nolan](#); [Spotts, Jeffrey M](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: RE: [EXTERNAL]: Proposed Rulemaking # 18-491 - 67 Pa. Code, Chapter 171.58
Date: Wednesday, May 27, 2026 9:27:00 AM
Attachments: [image001.png](#)

Received.

Josiah Shelly
Executive Director (R)
House Transportation Committee
Pennsylvania House of Representatives
129 Ryan Office Building
717-787-8592

From: Edwards, Victoria <victoredwa@pa.gov>
Sent: Wednesday, May 27, 2026 7:44 AM
To: Kerry Benninghoff <Kbenning@pahousegop.com>; Josiah Shelly <Jshelly@pahousegop.com>
Cc: Wagner, Teresa <tereswagne@pa.gov>; Trently, Nolan <ntrently@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Kayer, Kristin <kkayer@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: [EXTERNAL]: Proposed Rulemaking # 18-491 - 67 Pa. Code, Chapter 171.58
Importance: High

Good morning,

Please see the attached rulemaking documents for proposed rulemaking – 67 Pa. Code Chapter 171.58 Mid-Cabin Cameras (Agency #18-491). All rulemaking documents are included in the attached files. Please confirm your receipt of this email by responding with an email confirmation.

Thank you,

Victoria



Victoria P. Edwards | Assistant Chief 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

May 27, 2026

victoredwa@pa.gov | www.penndot.pa.gov

PRIVILEGED AND CONFIDENTIAL COMMUNICATION

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this information in error, please contact the sender and delete the message and material from all computers.

May 27, 2026

From: [Ritchie, Nolan](#)
To: [Edwards, Victoria](#)
Cc: [Ward, Senator Judy](#); [Wagner, Teresa](#); [Trently, Nolan](#); [Spotts, Jeffrey M](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: Proposed Rulemaking # 18-491 - 67 Pa. Code, Chapter 171.58
Date: Wednesday, May 27, 2026 10:15:42 AM
Attachments: [image001.png](#)

Good Morning:

First, this is to affirm that PennDOT delivered the proposed regulation in accordance with their email sent on May 11th for the planned delivery date of May 27th.

This email also confirms receipt of the proposed rulemaking, #18-491, on behalf of the Majority Chair for the Senate Transportation Committee.

Let me know if you have any questions.

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: Edwards, Victoria <victoredwa@pa.gov>
Sent: Wednesday, May 27, 2026 7:44 AM
To: Ward, Senator Judy <jward@pasen.gov>; Ritchie, Nolan <nritchie@pasen.gov>
Cc: Wagner, Teresa <tereswagne@pa.gov>; Trently, Nolan <ntrently@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Kayer, Kristin <kkayer@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: Proposed Rulemaking # 18-491 - 67 Pa. Code, Chapter 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 proposed rulemaking – 67 Pa. Code Chapter 171.58 Mid-Cabin Cameras (Agency #18-491). All rulemaking documents are included in the attached files. Please confirm your receipt of this email by responding with an email confirmation.

Thank you,

Victoria

RECEIVED

Independent Regulatory
Review Commission

May 27, 2026



Victoria P. Edwards | Assistant Chief 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

victoredwa@pa.gov | www.penndot.pa.gov

PRIVILEGED AND CONFIDENTIAL COMMUNICATION

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

May 27, 2026

From: [Gensimore, Justin](#)
To: [Edwards, Victoria](#); [Flynn, Senator Marty](#)
Cc: [Wagner, Teresa](#); [Trently, Nolan](#); [Spotts, Jeffrey M](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: Re: Proposed Rulemaking # 18-491 - 67 Pa. Code, Chapter 171.58
Date: Wednesday, May 27, 2026 7:52:37 AM
Attachments: [image001.png](#)

Good morning,

On behalf of Chairman Flynn, please be advised that we are in receipt of the attached proposed rulemaking documents.

Thank you.

Warm regards,

Justin M. Gensimore

Executive Director | Senate Transportation Committee

Policy Director | Office of Senator Marty Flynn

Room 184 Main Capitol | Harrisburg | PA | 17120

(O) 717.787.6481 | (E) Justin.Gensimore@PASenate.com

From: Edwards, Victoria <victoredwa@pa.gov>

Sent: Wednesday, May 27, 2026 7:44:28 AM

To: Flynn, Senator Marty <marty.flynn@pasenate.com>; Gensimore, Justin <Justin.Gensimore@pasenate.com>

Cc: Wagner, Teresa <tereswagne@pa.gov>; Trently, Nolan <ntrently@pa.gov>; Spotts, Jeffrey M <jespotts@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Kayer, Kristin <kkayer@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>

Subject: Proposed Rulemaking # 18-491 - 67 Pa. Code, Chapter 171.58

■ EXTERNAL EMAIL ■

Good morning,

Please see the attached rulemaking documents for proposed rulemaking – 67 Pa. Code Chapter 171.58 Mid-Cabin Cameras (Agency #18-491). All rulemaking documents are included in the attached files. Please confirm your receipt of this email by responding with an email confirmation.

Thank you,

Victoria

RECEIVED

Independent Regulatory
Review Commission

May 27, 2026



Victoria P. Edwards | Assistant Chief 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

victoredwa@pa.gov | www.penndot.pa.gov

PRIVILEGED AND CONFIDENTIAL COMMUNICATION

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

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.

May 27, 2026

From: [Bulletin](#)
To: [Edwards, Victoria](#)
Cc: [Spotts, Jeffrey M](#); [Domoto, Aaron](#); [Kayer, Kristin](#); [Fertenbaugh, Seth](#)
Subject: [External] Re: Proposed Rulemaking # 18-491 - 67 Pa Code, Chapter 171.58
Date: Wednesday, May 27, 2026 7:57:39 AM
Attachments: [image001.png](#)

***ATTENTION:** This email message is from an external sender. Do not open attachments or click links from unknown senders. To report suspicious email, use the [Report Phish button](#) in Outlook.*

Good morning, Victoria!

Thank you for sending Proposed Rulemaking 18-491 for publication in the Pennsylvania Bulletin. A member of our staff will be in touch regarding the publication date of this proposed rulemaking.

Have a great day!

Leah

From: Edwards, Victoria <victoredwa@pa.gov>
Sent: Wednesday, May 27, 2026 7:48 AM
To: Bulletin <bulletin@palrb.us>
Cc: Spotts, Jeffrey M <jespotts@pa.gov>; Domoto, Aaron <aardomoto@pa.gov>; Kayer, Kristin <kkayer@pa.gov>; Fertenbaugh, Seth <sfertenbau@pa.gov>
Subject: Proposed Rulemaking # 18-491 - 67 Pa Code, Chapter 171.58

Good morning,

As planned, attached please find PennDOT's proposed rulemaking #18-491 – 67 Pa. Code, Chapter 171.58. These documents are being simultaneously delivered to the House and Senate Transportation Committees. Once I receive your email confirmation, I will send it along with the other confirmations to IRRC. Attached please find the cover letter and the proposed rulemaking package in PDF. Also attached are Word versions of the Proposed Preamble and Annex A. Please send me an email confirming your receipt of this email and the attachments. Please also confirm the publication date.

Please let me know if you have any questions or concerns.

Thank you,

Victoria



Victoria P. Edwards | Assistant Chief 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

RECEIVED

Independent Regulatory
Review Commission

May 27, 2026

victoredwa@pa.gov | www.penndot.pa.gov

PRIVILEGED AND CONFIDENTIAL COMMUNICATION

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.