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**Background:** The original Camera Placement guidance letter was issued 12/18/2019. This 01/12/2024 revision adds more options if the cameras are flush mounted.

Due to the high back seat requirement on school buses, one camera in the driver's compartment, two cameras installed near the middle, and one camera installed in the rear of the school bus does not allow a view into each seat area. Advancements in camera technologies have allowed consumers to purchase durable systems that have wide angle view capabilities and some providers offer a flush mounted option.

**Question:** May school bus owners install more interior devices/cameras than what is allowed for in TR300.81(7)?

A school bus owner shall follow the steps required by Trans 300.80 to obtain approval prior to the installation, but in general, if the guidance below is followed, it will be allowed.

**Guidance:** The Division of State Patrol approves the install of additional interior devices with the following requirements:

- Not Flush Mounted:
  - All the requirements of TR300.81(7)(a), (b), (c), \*(d), (e), (f) and (g) must be met.
    - \*(d) currently limits two devices which must be located near the middle of a school bus.
  - DSP will allow up to **three devices** to be installed "located near the middle" of a school bus. "Located near the middle" is defined as the seating area between the front barrier and the rear seat back in front of the rear seat. All other provisions of (d) must be followed.
  - If a device is installed in the driver's compartment (a) must be followed. If a device is installed in the rear of the school bus (c) must be followed.
  - This exception will now allow a total of five interior devices to be installed in a school bus. One device in the driver's compartment, three devices near the middle of the school bus, and one device in the rear of the school bus.

- Flush Mounted:
  - If devices are flush mounted or extend no more than one inch from the ceiling and the edges are rounded or tapered, there is no limit to the number of devices that can be installed in the driver's compartment, near the middle of the school bus, or in the rear of the school bus. At no time, can projections from the ceiling be allowed in the entrance way or aisle even if they are flush mounted or extend no more than one inch from the ceiling. (Trans. 300.52)

**TR300.81 (7) CAMERA, AUDIO MONITOR OR RECORDING DEVICE / COMPUTER ANTENNA.** A school bus may be equipped with a camera, audio monitor or recording device, or computer antenna subject to the following conditions:

- (a) When a device is mounted in the driver's compartment it shall be located so as to not interfere with movement into and out of step well area. When a camera is placed to view through the windshield it shall not be located to the left of the centerline of the school bus. The camera shall be mounted not more than 2 inches below the upper edge of the area swept by the windshield wipers and located outside the driver's sight lines to the road, mirrors, highway signs and signals. *(See guidance letter issued on 06/20/2018 titled "Vehicle Safety Technology" for allowable placement of cameras to view through the windshield.)*
- (b) The device may not interfere with driver visibility and passenger entrance and aisle.
- (c) A device mounted in the rear of the school bus shall not protrude more than 6 inches forward of the rear bulkhead or from the ceiling.
- (d) A maximum of two devices may be located near the middle of a school bus, if they do not protrude more than 4 inches and are located no more than 15 inches above the side windows that are not emergency exits, measured from the edge of the window frame directly to the device. The device or devices shall be mounted parallel to a seat back. If flush mounted, the device or devices may be located beyond the 15 inch separation from the side window.
- (e) All devices shall be securely fastened and contained within a shatterproof housing. All exposed edges or sharp corners shall be protected or designed to prevent injury upon contact.
- (f) External devices shall be contained within a shatterproof housing.
- (g) A video display, if utilized, shall be mounted in the driver's compartment and within or in close proximity to the forward field of view of the driver. It shall not restrict visibility of the driver's sight lines to the road, mirrors, highway signs and signals, or affect operation of the school bus controls. The video display may be incorporated as part of the interior rear view mirror and display an image when the parking brake is applied, warning lamps are activated, or transmission is in reverse.

Sincerely,  
 Captain Karl L. Mittelstadt  
 Division of State Patrol – Motor Carrier Enforcement Section