The Office of Vehicle Safety Compliance (OVSC) of the National Highway Traffic Safety Administration (NHTSA) has observed the application of vinyl film advertising (full bus wraps) on transit windows may make the emergency exit windows inoperative.

Emergency exits in the bus need to be operable in case of an emergency. In order to permit the exits to function, it is necessary to trim around the emergency exit window seals. The window seals do not necessarily coincide with the window frame edge. The emergency exit window seals can be identified by opening the exit and noting the location of the edge of seal prior to applying the film.

Manufacturers of perforated vinyl window film - 3M, Avery Dennison, Clear Focus, MacTac, Oracal, and Flexcon have been advised of the problem and have issued revised application instructions to all purchasers of their vinyl film products. All of these manufacturers have additional instructions and information on their websites for correcting the problem. Additionally, the Professional Decal Applicators Association has been advised of the problem.

The Federal Transit Administration (FTA) strongly recommends the testing of all emergency exit windows currently covered by vinyl film advertising, and the necessary corrective actions taken on those windows found to be inoperative. Additionally, emergency exit windows should be immediately tested after new applications to assure proper operation.

Please note that the application of the vinyl film, without the appropriate scoring around the window, may make the emergency exit windows inoperative and alter the certification of compliance made by the original vehicle manufacturer to Federal Motor Vehicle Safety Standard (FMVSS) No. 217, “Bus emergency exits and window retention and release” [Title 49, United States Code (U.S.C.) § 30122].

If you have any questions or comments, please contact the FTA Office of Safety and Security at (202) 366-2896.