

From: [Kyle DeVivo](#)
To: [Finnegan, Richard \(DLT\)](#)
Subject: Comments on Proposed Rule 260-RICR-30-15-3
Date: Tuesday, June 23, 2026 3:45:34 PM
Attachments: [image775914.jpg](#)
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Good afternoon Richard,

My name is Kyle DeVivo, and I am the Chief Operating Officer of DATTCO. My family's company currently provides student transportation in the towns of North Smithfield and Burrillville, as well as approximately 150 vehicles in service for the Statewide transportation program managed by the Rhode Island Department of Education.

I am hoping to provide some comments and feedback on the proposed rulemaking referenced in the subject line pertaining to the addition of workers in school transportation to existing prevailing wage laws. In concept, we are certainly on board with the idea that our employees and others across the state providing school transportation services ought to be eligible for competitive wages and benefits that are at or above a market standard. That being said, if a new standard is being set, companies like mine either require notice to make any necessary changes in order to comply, or the opportunity to renegotiate our fixed price contracts with our customers in order to accommodate the changes in the form of compelling the contracts to be reopened and negotiated in good faith.

Anecdotally speaking, my company and others have been able to attract drivers to train for a license (we provide training at our own expense) and work for us at the rates and benefits we are currently paying. We further have plans to aggressively increase those already competitive wages and benefits even if this change were not to be made to the law. Competition for drivers in our industry has continued to push wages higher over the last 5 years without this change going into effect.

It also raises the concern of the increasing cost of student transportation, which is due in large part to wage and benefits increases that are already happening, but also by other factors like the cost of vehicles, fuel, bus parts, and liability insurance premiums. As currently amended in the proposed rule, any increase in labor cost would ultimately be borne by communities across Rhode Island over time. Are any steps being taken at the state level to assist communities in filling the funding gap that would be created by this law?

Private contractors like ourselves were honestly a bit caught off guard by this legislation, and more specifically, by the amounts that were ultimately selected to be used by the Department of Labor. The wage and fringe benefit amounts seem to neglect important demographic differences between urban and rural communities and broadly applies a standard to places with very different economic circumstances. I am also concerned at the overall lack of response and context that seems to have been applied to the process of selecting the numbers that would be used.

The ask is simple: that the implementation of this legislation be delayed until proper consideration can be given to the current standards for wages and benefits for school transportation workers being paid across the state, and that private contractors also have a seat at the table to consider the implications of this very important issue. Further, if the legislation is in fact passed, I would ask that proper consideration be given to both revenue and labor contracts that are already in effect and give an adequate and reasonable amount of time for contractors to adjust pricing and communicate with customers. A suggestion would be to delay compliance requirements for contractors to the next time the revenue agreement expires, giving the opportunity then for appropriate price increases to cover these costs.

Thank you for your time and consideration. I would welcome a follow up discussion on the matter or be willing to answer any questions that arise.

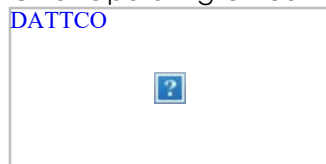
Sincerely,

Kyle DeVivo

P.S. Can you please confirm receipt of these comments and that this is an appropriate way to have them submitted for consideration?

Kyle DeVivo
Chief Operating Officer

[DATTCO](#)



583 South Street | New Britain, CT 06051 [google.com]
p +1 860-357-5571



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