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all black schools and this definition provided a working procedure to follow in arriving at a desegregation plan. It was a working procedure that I felt would prevent resegregation from taking place and I assume that that's what the Court had ordered me to do.

Q. And this is what your statistics show, is this correct?
A. There are one or two schools that are slightly off.

Q. I mean generally. A. Yes.

Q. I believe you also assume that the neighborhood school was no longer a predominant pattern that would be followed in the desegregated system, is this correct? A. Yes. I believe the Court had something to say about that in their original Court order. It might be appropriate to quote from it.

Mr. Chambers: Is that the April 23 order you're referring to?

Mr. Waggoner: I have a package you sent me in the mail, let me get it. Which order are you reading from?

Mr. Chambers: April 23.

【44】 A. The Court said in its April 23 order: "If this court were writing the philosophy of education, he would suggest that educators should concentrate on planning schools as educational institutions rather than as neighborhood proprietorships. The neighborhood school concept may well be invalid for school administrative purposes even without regard for racial problems." He had many other things to say on the neighborhood school but I was following the Court order and so I assumed I was not required to follow the neighborhood school concept.

Q. All right. So you have abandoned this concept to the extent that it doesn't produce desegregation, is that basi-

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cally what you have done? A. I have carried out the Court order.

Q. You also make a recommendation that the school authorities stay on top of this and revise and constantly look over the boundaries and ratios of students in schools so as to, in effect, police it, is this correct? A. So as to maintain desegregated schools, yes, sir. I suppose that if an all black school is unconstitutional, it is required that the school board take corrective action and I so recommend to the Court.

Q. This is a question that hasn't been fully answered by the courts yet, has it, to your knowledge? A. I'm an educator, not a lawyer.

【45】 Q. Now, with reference to transportation you made certain recommendations, one of which was staggering the opening and closing of schools. Are you familiar with the method of employment of the drivers of the school buses? A. Yes, I am.

Q. Would you describe it for me? A. Well, it's put out in one of these affidavits here. It's not my intent to have recommended that student drivers be assigned to this transportation for cross busing. I would use adult drivers.

Q. You would use adult drivers. A. As I testified earlier, those buses will have to return to their starting point for their return trip.

Q. What utilization would you make of these employees as an educator while they are not driving the buses?

Mr. Chambers: Well . . .

Mr. Waggoner: I'm asking. This is part of the overall expense.

Mr. Chambers: What use do you make of the adult bus drivers now?

Mr. Waggoner: I'm asking him.

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A. You ask me as an educator and I don't see why that's relevant to an educational problem. I didn't intend to make any use but there might be some use for them in the schools where they. . . .

【46】 Q. Would it be fair to say that you haven't considered that? A. Yes, indeed, it would be fair.

Q. I believe you also recommended that students residing more than one and one-half miles from their school should not be penalized by having to walk, nor be penalized by having to pay for public transportation. A. I so recommended that to the Court. It's a matter of record.

Q. Do you still adhere to this recommendation? A. Well, I think it's important that we differentiate between that transportation that makes the walking distance one and a half miles and that transportation that is involved in simply carrying out the desegregation plan. Those are two separate and distinct problems. If the School Board proposes to have these children in grid #296C walk over to Eastway, a distance of four miles, they'd go that distance under either plan. It would seem to me that since the children who are doing most of the walking would be black children that it wasn't fair to them.

Q. I ask you to address yourself to Northwest Junior High. A. Yes, sir.

Q. What students would be walking to that school? A. Well, it would be a lot of black children walking to that school. Some children live outside the district line that I assume will be riding to the school.

Q. There are many of those students who are white who will be 【47】 walking, are there not? A. There will be some students—and I don't know just where this line is—that will be walking in because the earliest city district line is not shown on these maps. One can't look at this map and

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see. I understand the Court has asked for the documentation so that one can determine the numbers of students. I couldn't answer that question.

Q. I ask you to address yourself to the J. T. Williams line and ask you what race of students will be walking there. A. I said that I thought the Hidden Valley students would be walking into the Williams School and I said that I thought that was too far for them to walk. Someone corrected me and said that they lived outside the old city limit and so they would be entitled to transportation. The only thing that it seems clear to me is that the students who will be attending the Williams Junior High School are the same students under either plan, or essentially the same students, so that the question is whether or not students are to be required to walk long distances or not.

Q. The walking will involve both black and white, will it not? A. I believe I testified earlier that it looked to me as if there would be far more black students who would be doing the walking but I haven't actually made a count of the number of black and white students.

Q. This is at best a guess on your part? **¶48** A. I wouldn't exactly call it a guess. I have studied these maps carefully over a long period of time.

(At this point in the proceedings Mr. Horack and Mr. Morgan arrived in the hearing room.)

Q. Dr. Finger, with reference to your recommendations on implementation of a desegregation plan, you recommended to the Court as an educator that the assignment of high school students be made as soon as possible and also junior high, but by reason of curriculum and faculty changes and things of this nature it would be unwise to do it prior to the end of the year, is this correct, from an educational

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standpoint? A. I believe I differentiated between the senior high schools and junior high schools in that the requirements at the senior high school level, the programs were much more tailored to individual students. Therefore, in my opinion these students should be allowed to continue their education in their present schools and I suggested to the Court that if the schools were planning the programs and were assigning the courses to the students during this spring semester that might constitute a phasing in of the desegregation plan.

Q. But the actual attendance of the students at the schools would be deferred until next year according to your recommendation. A. Do you have the page?

Q. Not numbered. **【49】** A. I numbered mine.

Q. It looks like about page 10 or 11. A. My recommendation was that the assignment of high school students be made as soon as possible so that detailed plans for curriculum and faculty changes can be completed. The students in the present 10th and 11th grades should be required to report to their new school assignments during the spring semester. And I left that intentionally vague.

Q. Was there any reason why you were more specific with reference to junior high schools wherein you stated: "The school department should be required at least to have the junior high school students report to their new school assignments during the last week of school."? Is there any reason for differentiating between junior and senior highs? A. It was my understanding that the Court was uncertain as to what the law required it to do.

Q. I'm asking you as an educator. A. Repeat the question.

Q. As an educator do you feel it desirable to uproot junior and senior high school students on May 4 and physically put them in another school?

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Mr. Chambers: We object to the question.

A. I would say that the question was . . . strike that, that was off the record.

Q. We don't have off the record. You can't answer the question? **【50】** A. Of course, I can answer the question. My recommendations are stated in the document and as an educator I would feel that the junior and senior high school students should be allowed to stay in their present school assignments during the current year but that they should report to their new school assignments during the last few weeks of school so that the school programs can be adequately planned for the fall semester.

Q. And this is primarily by reason of curriculum and faculty and things of this nature, is that correct? A. And it's also so that the whole implementation of the plan can be restructured during the summer, the transportation reexamined and approved, and so on.

Q. You're firmly satisfied that there is no way to desegregate the inner city schools other than the long-distance busing of the nature that has been employed in your plan, is this correct? A. Long-distance is a relative term.

Mr. Chambers: I object to the form of the question, too. Mr. Waggoner is inserting a lot of adjectives that are opinionated by Mr. Waggoner and not justified by the facts in the case.

Q. Would you read the question back, please?

(The Court Reporter reads the question on Line 14 above.)

【51】 A. I prepared some plans that had shorter distances in them and I believe I say in my report that one can con-

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trol the distance that a child is to be bused and which children are to be bused when there is little control over the number to be bused.

Q. All right. You have a statement in your recommendation: Should a child residing five miles from a school be exempt but not a child who would be bused four miles. Is this in the area that you think is a reasonable distance to be bused for desegregation, between four and five miles? A. Most of the transportation in the proposed plan, the court consultant plan, exceeds that distance. It was simply a manner of speaking.

Q. Then there is no significance you would attach to the use of four miles or five miles in your report to the Court? A. The importance of distance depends upon the roads and the traffic conditions. Five miles isn't long on an expressway, ten miles isn't long on an expressway; ten miles isn't long on a main highway where the bus can move.

Q. Do you know the maximum speed a school bus can travel in the State? A. I believe it's in one of the affidavits. Is it 35 miles an hour?

Q. That's correct. Do you know the minimum speed limits on the interstate highways? Is it 45 miles? **【52】** A. I just mentioned interstate highways. I don't think anyone was proposing transporting these children on interstate highways.

Q. You would object to it yourself, wouldn't you? A. I think it might be done but it was my understanding that the school department felt it was unwise to do that.

Q. Is there a great difference of opinion among educators as to whether or not an elementary child should be bused to achieve desegregation? A. There's an awful lot of difference of opinion these days on busing. It seems to be a major issue, doesn't it? Professor Coleman who

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wrote the Coleman Report spoke to that matter recently. There was a story in the New York Times about it. He was the one that wrote the Coleman Report that produced a lot of evidence as to the desirability of desegregating schools. He certainly felt busing was worth it.

Q. As far as elementary children were concerned? A. Yes, sir.

Q. Are there any educators who feel busing of elementary children is unwise? A. I suppose there are some. One can find people on most sides of most things.

Q. You conducted a major survey of this system with Dr. Passey, did you not? A. That isn't the language I'd use to describe my work with [53] Professor Passey. He was involved originally in the Charlotte case and he drew up a desegregation plan and he testified to the Court. I really wasn't very much involved with Professor Passey.

Q. He is a colleague at Rhode Island College, is he not? A. Yes, he is on the faculty of Rhode Island College.

Q. You were present in the courtroom when he testified he did not favor busing elementary children, particularly grades 1 through 4, out of their neighborhoods for safety and other reasons that are attributed to the neighborhood benefits. Were you present then? A. I don't think I was.

Q. Is this an unsound educational position? A. I believe that some 18 to 23,000 children in the Charlotte-Mecklenburg County get transported now and a large portion of those are elementary school children.

Q. Would you answer the question? A. What's your question, which way did you put it? Is it unsound to bus children? No, it's not unsound to bus them.

Q. Is it unsound to unnecessarily bus them?

Mr. Chambers: Objection to the form of the ques-

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tion. Will you define what you mean by unnecessarily?

Mr. Waggoner: I'll let the question stand.

A. I don't know what you mean by unnecessarily. If the only way [54] to desegregate schools is to bus elementary school children, I don't think that's unnecessary, for educational reasons.

Q. Let me ask you this question. I asked you this earlier and haven't had an answer yet. Is there wide dispute among educators as to the relative benefits of busing elementary children to achieve desegregation substantial distances from their homes? A. I don't know what you mean by substantial distances.

Q. All right, ten miles. A. I don't believe all educators feel that one ought to bus children. Apparently a great many educators do because they have abandoned the one-room school house in favor of central consolidated schools. So I guess they think there are educational advantages to busing children.

Q. Are there a substantial number of educators who feel there are disadvantages to the type busing we are discussing of elementary children? A. I don't think this type of busing is any different from any other type of busing. The question is whether the child will benefit educationally.

Q. Would you answer the question, please, Dr. Finger?
A. Give me the question.

Q. Would you read it back to him, please.

(The Court Reporter reads the question on Line 15 above.)

A. I don't know what you mean by a substantial number, whether [55] you mean 10 or 30%.

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Q. Tell me how many or percentage, either one. A. I never made a survey, I don't know. I don't know of any survey that's been made as to the number.

Q. You're saying you don't know how many are in favor of it or how many are against it, the only thing you know is your own opinion, is this correct? A. I didn't say it was my opinion, Mr. Waggoner. I just quoted one of the nation's most outstanding authorities on this matter.

Q. Is he the only one that you know of, then? A. Of course not.

Q. Who are the other ones? A. (No answer given.)

Q. Since there has been no answer, I'll go on to something else. A. I was wondering how to respond to that. I think there are a large number of educators who are. It's obvious that many cities are carrying out desegregation plans because they think it's sound educationally. It's clear that a number of people have done analyses of the Coleman Report and have reported on the adequacy of that study and of the expectancies that one can have from desegregated schools. I think there is a substantial body of knowledge concerning the expected outcomes from desegregation.

Q. All right. You have told me of those who support your [56] position. Are there any that don't support your position? A. I don't know of any research studies that show that children do not benefit from attending desegregated schools.

Q. That's not the question I asked you. A. I know that there are some high school principals and school principals here in Charlotte who oppose it. Is that what you want me to say?

Q. I'm asking you to say whatever you have knowledge of.

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Mr. Chambers: What's the question about?

Mr. Waggoner: We spent 15 minutes asking Dr. Finger if he knows the degree of dispute among educators as to the relative advantages and disadvantages of transporting elementary children ten miles to achieve a desegregated education. The question relates to whether or not the advantages of transportation outweigh the advantages of desegregation, the type of transportation we have in the Charlotte system.

Mr. Chambers: Your question is whether the advantages of transportation outweigh the advantages of desegregation?

Mr. Waggoner: Whether the disadvantages of transportation outweigh the advantages of desegregation.

A. I don't think that's an equation. I think that it's demonstrated that there are educational advantages to be obtained **【57】** from desegregation and there is a body of research that supports that.

Q. Well, I won't pursue that line of questioning any more. Now, you have had great quarrel with Mr. Morgan's transportation figures. Let me see if I can ask this question to bring some light on the matter. The Board plan, utilizing the requirements of State law, will bus approximately 4900 students. Is this reasonably correct, additional students? A. That's reasonably correct, yes. This is according to the Morgan affidavit.

Q. And your plan proposed adding to that the cross busing of approximately 10,000 black and white students, is that correct? A. Yes, that's correct.

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Q. So you're somewhere in the neighborhood of 14,000 students, is that correct? A. That's correct.

Q. In addition your plan would furnish transportation to all students who reside within a mile and a half, whether or not they are eligible for transportation, is this correct? . . . under State law. A. No, that's not correct.

Q. Well, let's take a look at your report. A. I have already testified that one should differentiate between the recommendation to the Court about walking and the equal [58] treatment of children. That recommendation would apply under either plan, whether it was the Board plan or the court consultant plan.

Q. But the Board didn't choose to adopt that, did it? A. The Board doesn't choose to . . . the Board didn't choose to adopt that.

Q. So the Board figures 4900 to the best of your knowledge. A. If we count children in the same way, the Board plan calls for the transportation of approximately 4500 children and the court consultant plan calls for that same number plus 10,000 children to be bused under pairing. Under either plan, if transportation is provided to children who must walk more than a mile and a half, there will be additional transportation and in my opinion that additional amount will be about the same under either plan.

Q. That's correct. Now, you're familiar with the fact that Judge McMillan's order of February 5th provided that the School Board would determine a walking distance and furnish transportation to every student whose attendance at school is required for desegregation, is that correct? I direct you to Page 3, Paragraph 7. A. The Court ordered: "That transportation be offered on a uniform non-racial basis to all children whose attendance in any school is necessary to bring about the reduction of segregation, and

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who live farther from the school to which they [59] are assigned than the Board determines to be walking distance."

Q. Now, under your balancing arrangement the attendance of any child at a school affects the degree of desegregation that school has, does it not? I'm sorry, I'll pick it up again. You have imposed and so has the Court imposed a balancing of races within the schools, is this correct?

A. I don't know.

Q. I mean, this was your goal, to achieve as much balance as reasonably possible, is this correct? A. In my report to the Court I defined a desegregated school and then I attempted to have all schools meet that definition.

Q. This definition was an attempt to meet as much of a racial balance as possible, is this correct? A. I already answered that question.

Q. Will you answer it again? A. Yes. I defined a desegregated school in my report to the Court and I tried to have all the schools fall within that definition of a desegregated school.

Q. And this involves racial balance, does it not? A. Those are your words, not mine.

Q. I'm asking you. A. I'll answer that question the same way I answered it before. I defined a desegregated school and I attempted to have all the schools fall within that definition.

Q. We don't have the privilege of a Court present. Will you [60] answer my question?

Mr. Chambers: I object to that. I think the witness has already answered the question.

Mr. Waggoner: He can answer it yes or no and he can explain it.

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Mr. Chambers: He's given you an answer, he's told you what he did. You just want him to say something he hasn't said.

Mr. Waggoner: He can say it's a racial balance or it's not a racial balance.

A. I don't know what a racial balance is. That's why I used the language I used here.

Q. You don't know what a racial balance is. All right.

Mr. Chambers: How are you defining racial balance?

Mr. Waggoner: Racial balance is similar to what the judge indicated in his prior order, it should be approximately the same number of students of each race in each school.

Mr. Chambers: I want to call the Court's attention at this time to the Court decision of February 5th. The language of that opinion appears on Page 2, bottom of the page, and continuing on Page 3.

(The Court Reporter at this point in the proceedings reminded **【61】** counsel it was 5:00 and that it had been ordered that the deposition of Mr. Morgan begin precisely at 5:00 o'clock.)

Mr. Waggoner: I'd like to continue.

Are you talking about the statement of the Judge?

Mr. Chambers: Yes.

Mr. Waggoner: I'm asking this gentleman what his definition is.

Mr. Chambers: Definition of a racial balance?

Mr. Waggoner: Yes.

Mr. Chambers: Are you asking him a racial balance and asking him to define what you mean by racial balance?

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Mr. Waggoner: If he can define the term racial balance.

Q. Can you do this? A. Mr. Waggoner, I already testified to the fact that I was required to carry out an order of the Court which required me to draw up a plan which ended up with no all black schools. In order for me to carry out that order, I needed to have some kind of definition to follow as to what constituted a desegregated school. So I defined it and I made it very clear that my definition was so that I could refer to the words desegregated schools in order to explain what procedures I was following. Now, if you wish to say that my definition of a desegregated school is racial balance, that is for you [62] to say. The Court has said that that was not his order and it is not the language that I used in my report to the Court.

Q. I'm asking you, then, did the results of your plan following the Court's instructions achieve a racial balance in the schools. A. I sometimes indicated that I thought it was unwise to allow the proportion of black students to be too dispartent with those in all the rest of the schools in the county but I might have been following a rule similar to the one the Board of Education followed in drawing up its computer assigned attendance zones in which it set a limit of some kind of the proportion of black students in a school, I believe 40%.

Mr. Chambers: Can we go off the record one minute? Judge Warlick ordered us to depose Mr. Morgan at 5:00 o'clock. Dr. Finger has a 6:59 plane.

Mr. Waggoner: Julius, I'm extremely sorry but you have gone into a great deal of detail on transportation.

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Mr. Chambers: The only thing I mean is would you go ahead with Dr. Finger and then let us pick up Mr. Morgan?

Mr. Waggoner: We will waive Mr. Morgan until we get through here.

(The Court Reporter informed counsel that the above would [63] appear in the record in view of Judge Warlick's order to the Court Reporter to proceed with the examination of Mr. Morgan at 5:00 o'clock.)

Q. Do you interpret the language that students of all grades be assigned in such a way that as nearly as practicable the various schools at various grade levels have the same proportion of black and white students, would you interpret that as being an attempt to reach a racial balance?

Mr. Chambers: Where are you reading from?

Mr. Waggoner: I'm reading from the December 1 order.

Mr. Chambers: You're asking the witness to interpret the Court order?

Mr. Waggoner: No, this is the February 5th order, third page. I'm asking him if that is the balance he tried to achieve. I'm asking whatever my question was.

A. Where are you reading from?

Q. Page 3, February 5 order, paragraph 6. A. Well, the Court makes that statement on Page 3 and on the bottom of Page 2 he says that the order which follows is not based upon any requirement of racial balance.

Q. I understand that, but did you achieve racial balance in your results? A. May we take a

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【64】 Q. Let's talk, let's stay on the record. I want to get out of here. A. I find that language of the Court a little puzzling. The Court did not use the language racial balance and neither did I. For some reason the Court avoided it and so do I.

Q. You're avoiding it because the Court did? A. Apparently there is some reason that you don't want to avoid it.

Q. That's correct. A. I can only answer the question as I did before. I defined desegregated schools and I tried to carry out, in effect, the statement here that pupils of all grades be assigned in such a way that as nearly as practicable the various schools at various grade levels have about the same proportion of black and white students, and that plan that I submitted to the Court in effect does that.

Q. Now, with reference to transportation, you're familiar with the fact that the Court originally ordered the furnishing of transportation to all students who live more than a walking distance whose presence at a school was necessary for desegregation, is this correct? A. Where do we find that again?

Q. Page 3.

Mr. Chambers: Objection to the question unless you're also going to read . . .

【65】 Mr. Waggoner: I will, give me time.

Mr. Chambers: You asked him what the Court directed. Why don't you put down what the Court said it directed?

Mr. Waggoner: Let me handle my examination.

Mr. Chambers: I don't think you ought to mislead the witness.

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Mr. Waggoner: I'm not misleading the witness.
I'm just asking this.

A. You just read that statement a minute ago. You want to read it again?

Q. If you like, paragraph 7. A. "That transportation be offered on a uniform non-racial basis to all children whose attendance in any school is necessary to bring about the reduction of segregation, and who live farther from the school to which they are assigned than the Board determines to be walking distance." Now, I would have thought if the Board determined walking distance for one plan, they would determine it for another plan in the same way.

Q. All right. Now, with reference to this the Board established one and a half miles as a walking distance and it was on this basis that computations were made reflecting that 23,000 students would be transported under your plan. Do you dispute these figures? A. I have no way of judging.

【66】 Q. Now, on March 3 the Court entered a supplemental order—and continue to refer to that paragraph—and he indicates there has been some misunderstanding concerning what he meant and he therefore amends the order by deleting the words "attendance in any school" and inserting the words "reassignment to any school" Do you understand this to mean that any student who lives in his old attendance district and is in a school and resides more than a mile and a half will not be furnished transportation?

Mr. Chambers: Are you asking him to interpret the Court's decision?

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Mr. Waggoner: I'm asking him to interpret this to see that he understands my next question.

A. As I read the entire Court order it seems to me that the Court is saying that his new revision is such that approximately 4500 plus the 10,000 we have been talking about would be the number of children he is ordering the Board to transport.

Q. Do you understand that the Board plan would not transport students in the AG district and your plan would and the Court ordered plan would? A. Will you explain to me why? . . . I'm the one to testify. What's your question, Mr. Waggoner? Do I understand . . . no, I don't understand it that way. No, I don't.

Q. The Board plan will not furnish transportation to any student [67] who resides in the city limits and attends the city school. Do you understand that, the city limits of '57? A. Yes.

Q. Your plan would and so would the Judge's for those who have been reassigned. A. Yes, that's correct, Mr. Waggoner.

Q. Now, the computations you made didn't take into consideration the original Court order requirement for transportation of all students within a walking distance.

Mr. Chambers: Objection to that because that is not the original Court order.

Mr. Waggoner: There was enough misunderstanding about it for the Judge to write another order.

Mr. Chambers: The interpretation given the order by the School Board and nobody else. I think the question is unfair and misleading to this witness and I object to the form of the question.

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A. What's the question?

Q. Would you read it back?

(The Court Reporter reads the question on Line 7 above.)

Q. Whose presence is required for desegregation. A. I didn't calculate students the same way Mr. Morgan did.

Q. Would you answer the question and then explain if you wish? A. I thought I did answer the question, didn't I? Apparently Mr. Morgan was certainly counting a different kind of student **[68]** than I was.

Q. Tell me what students you counted, Dr. Finger.
A. Well, let's see if we can reach some agreement what we're talking about so we have some clarity on this matter. It seems to me that when we talk about the students who are in schools that are involved in pairing that the amount of transportation required that I'm talking about is the same transportation that is now provided by the School Board because those are the same attendance zones that are now currently being used and that will be used in the future and that in addition to those students, for those students there is an additional amount of transportation required of 10,000 elementary students. Now, when I read Mr. Morgan's figures I find that his estimates for elementary transportation exceed that amount and I would think for clarity what I've been talking about for those schools that are to be paired that there is the present amount of transportation now provided by the Board of Education, plus the 10,000 students who would be bused to accomplish the pairing.

Q. Do I understand that you're saying that you would furnish transportation to those students who are entitled

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to transportation under State law plus the 10,000 students who are involved in cross busing? A. I don't see how I could make my statement more precise than I made it before and would prefer not to reword it.

【69】 Q. I didn't understand it. It doesn't agree with what I said. A. Well, we can go to any school district you want to at the elementary level like Huntingtown Farms and under the court consultant plan the school attendance zone for Huntingtown Farms is identical to the current attendance zone for Huntingtown Farms and all those students currently transported in that attendance zone would continue to be transported and that in addition some of those students would be transported to accomplish the pairing. Therefore, the amount of transportation under the elementary pairing plan would be the amount now being provided plus 10,000.

Q. In those 34 schools? A. Yes, sir, that's what we've been talking about.

Q. What other transportation would you provide? What other transportation did you provide in the figures that you gave me? A. None.

Q. You would only provide the 10,000 elementary students with transportation? A. We were talking just about elementary schools.

Q. All right. You would provide none for any other elementary students. A. OK.

Q. What other transportation would you provide for junior high schools? 【70】 A. Let's make sure that question is clear because there are some students who are currently being transported who would continue to be transported. They might be assigned to a different school and I do not know whether the amount of transportation would increase

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or not. For example, I look at the Amay James District and I see that there are some children that are going to be transported, I presume they are going to be transported to Amay James School. They're entitled to it. Those students are being transported to some school now. So that it's my opinion that the total amount of transportation involved in this system would be that amount currently being provided plus that amount which is involved in the pairing arrangement, the 10,000. Now, I talked about the 34 schools only to be very precise and point out that those attendance zones are identical to the attendance zones now being used. There are some other attendance zones that have been changed and as a result there might be some children transported to a different school, but presumably those children who are entitled to transportation would still be entitled to transportation. There might be some small changes and there might be some small increases but I assume that the number is approximately the same.

Q. All right. Let me ask you if this is a fair statement; that in the elementary schools that to get the students to Barringer School you would transport an additional 197 to the **【70A】** school so they could be picked up . . . wait a minute, that's not a cross busing school. Would you transport 197 students to Barringer School? A. I don't know what the question is, would I. What do you mean by that?

Q. Under your plan or under your computations. A. The consultant plan and the Board plan for Barringer are identical, are they not?

Q. That's correct. You said you wouldn't furnish any additional transportation on the elementary level to any other school. A. All those youngsters reside within a mile and a half of the school.

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Q. Is that the linear distance or is that the road distance?
A. Well, do you want to come look at the boundary? None of those boundaries are more than, I don't believe by any way you want to figure it, more than a mile and a half for those children.

Q. I ask you to closely look at the boundary and not mistake the old boundary. A. Is that the boundary there?

Q. It sure is. A. That's just about a mile and a half. There may be a few children residing in there that exceed that distance.

Q. Would 197 be approximately correct? A. Might be.

【71】 Q. Would you like to look at the Berryhill School while you're up and see if 274 would be transported? You understand that State law provides transportation by the nearest route and not a radius. A. I understand that. There are some children residing here, in this district here, which I presume are well beyond a mile and a half. Is that 190?

Q. 274. What about Billingsville? Would you transport 259 students to that school under your plan? A. Under the Board plan?

Q. Either plan. A. OK. If you say that's the number that live more than a mile and a half from the school.

Q. Then you would have transportation furnished to additional elementary students. A. I testified there might be some additional students that would be transported but that's a small number of students.

Q. This is without regard to whether or not they are reassigned to that school or not, is that correct?

Mr. Chambers: Objection to the form of the question.

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A. I don't understand your question, Mr. Waggoner. These are elementary school children who, under the Board developed plan utilizing these computer assignment system, end up residing more than a mile and a half and are therefore **【72】** entitled to transportation as elementary school students. Is that correct?

Q. That's correct. And they are eligible under State law for transportation. When did you make your computations with respect to transportation? . . . the requirements as far as numbers of buses and numbers of students. A. Within the last few days.

Q. Within the last few days. When did you first see Mr. Morgan's affidavit? A. This morning.

Q. At what time? A. 10:12.

Q. Did you spend the entire time prior to 12:00 o'clock studying that affidavit? A. Yes, I did.

Q. You made comparisons during that time? A. Yes, sir.

Q. So in an hour and forty minutes you're in a position to question the extensive transportation contained in Mr. Morgan's affidavit? A. It's quite clear, as I have testified over and over again, that Mr. Morgan is following a different set of rules and that we're talking about the same school attendance zones and under one set of rules you transport a lot of children and under a different set of rules you transport a different **【73】** number of children. I think it's important to understand that the attendance zones are the same or nearly the same.

Q. The point I'm trying to get across, Dr. Finger, is that the Board, as you say, uses one set of rules in which they will furnish transportation to students who are eligible under State law for transportation and in your report to the Court you indicated that transportation should be fur-

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nished to all students residing more than a mile and a half from the school irrespective of State law.

Mr. Chambers: Are we talking about Dr. Finger's recommendations or what the Court directed?

Mr. Waggoner: I'm talking about his recommendation just now.

A. What page is that on?

Q. 10 or 12. A. Right of student to be transported. Students residing more than one and a half miles from the school should not be penalized by having to walk to school, or penalized financially by having to pay for public transportation. Students residing more than one and one-half miles from the school to which they are assigned should receive free transportation. The School Board should either provide for free public transportation or provide school buses. I recommended that to the Court.

Q. Have you made any computation with reference to the number of **【74】** students who would be transported under that definition? A. No, I have not.

Q. You cannot, then, dispute the 23,00 figure that Mr. Morgan has developed, is that correct?

Mr. Chambers: Are you suggesting that Mr. Morgan used the recommendations of the Court order?

Mr. Waggoner: I'm talking with reference to the recommendation.

A. I would have thought Mr. Morgan followed the Court order.

Q. Will you answer my question? A. What is the question?

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Q. You have no reason to dispute Mr. Morgan's figure of 23,000 students. A. I answered that question once. I said the answer to that was no, I have no reason to dispute it. I have no basis for judging it.

Q. When did you first see the amendment to the Judge's order with reference to his order of February 5? A. It was on my mantel at home special delivery, airmail, at 7:00 o'clock last night when I got home from school.

Q. Have you made a computation with reference to the number of students who would have to be transported under the Judge's amended order? A. I believe that we have completed talking about the number of children to be transported under the Judge's amended order [75] for elementary schools, that we have completed that. I believe the numbers we have been talking about for elementary schools are essentially those that complied with the Judge's amended order.

Q. On the elementary level? A. On the elementary level.

Q. And what total did you come up with? A. I thought we had said that a half-dozen times.

Q. You haven't told me. A. We just pointed out a few instances, did we not, that involved several hundred children that I did not count. So that we have talked about, in addition to the 10,000, apparently there are a small number of additional children who must be transported to their elementary schools. I do not know the exact number of these but I assume that we have substantially covered most of these in the recent testimony.

Q. Well, would it surprise you if I told you that the figures I was reading related to the transportation requirements under the Board plan? I will withdraw the question. Dr. Finger, you haven't made a careful study of the transportation requirements as required by the amended Court

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order of February 5th and March 3, have you? A. I made some estimates.

Q. All right, will you give them to me? A. I need a little advice. I don't know which attorney to turn **[76]** to for advice, you know. I'm off the record there.

Q. Leave it on the record. A. May I have a five minute recess?

Mr. Chambers: Yes.

Mr. Waggoner: I would prefer to go ahead and finish. If you want to take time and think, that's all right. I don't want to interrupt now.

Mr. Chambers: Do you have a question, Dr. Finger?

A. I just need to be sure I understand the Court order so that I understand this question so that I know exactly what I'm testifying to. Let me see now. I think those are all the estimates I have been talking about. Excuse me, where is this revised order?

Mr. Chambers: We can take a recess if Dr. Finger has a question he wants to ask.

Mr. Waggoner: Let him ask it in the presence of everyone.

Mr. Chambers: If you don't understand the question posed by counsel, tell him you don't understand the question, unless he wants to take a break to find out exactly what his question is about.

Mr. Waggoner: He can ask and we can put it on the record, there's no objection to that. He can ask me and I'll respond as best I can.

A. As I understand the language of the Court order, the

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Court has [77] said that whether the Court consultant plan is adopted or whether the Board plan is adopted that certain children are entitled to transportation under that plan and that children residing in these satellite zones here would be required to be provided with transportation. Is that your interpretation?

Q. That's a part of it. Let me direct your attention to Randolph Junior High School. Randolph Junior High is located here. There is a neck that goes on past the Billingsville area to pick up black students. These students in this neck do not reside in this district. They have been reassigned to the school and would be furnished transportation, as I understand the Court order. Have you made a computation as to the number of students who would be required to be furnished transportation at Randolph Junior High School? A. I think I have and I want to be sure that I have and that the testimony that I give is correct and accurate. Yes, I have made such an examination. I counted as follows: For Alexander Graham Junior High School 360 students.

Q. That's a result of your satellite zone? A. Yes, sir.

Q. That is all it includes, is that correct? A. Yes, that's correct. I have based the estimates of the number of buses that would be required to transport junior high school students on the number of students reported by the school department according to State regulations and in [78] addition I have made an analysis of the number of students in the satellite zones; for Alexander Graham 360; for McClintock 325; for Quail Hollow 274; for Carmel Road 142.

Q. Let me interrupt you for a minute, Dr. Finger. You have not taken into consideration any other students who may have been reassigned to that school who are not in

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the satellite zone, is that correct? A. Unless they were included in the original report that the school department submitted to me.

Q. You're familiar with the fact that the report submitted to you by the school department was purely for students eligible under State law for transportation? A. I have testified to that a number of times, yes, sir.

Q. All right, and that the school department's report doesn't include reassigned students in the Alexander Graham district and you've made no allowance for that, have you? A. Mr. Waggoner, I looked at the plan proposed by the Board, I examined the transportation estimates prepared by Mr. Morgan and listed under the Board plan, and I observed that there were some children who lived a long distance from the school. In estimating the number of children who might be entitled to transportation, I counted the children who were in the satellite zones.

Q. Then you have not taken into account any other students who may have been reassigned to that school other than those [79] living in the satellite zones. A. Well, that's not wholly true. I noted this Sedgefield neck up here and I made an estimate of the number of students that resided there and counted them.

Q. Did you take into account any students who would attend Alexander Graham who reside in grids 402B and 403A? A. No, I did not.

Q. A similar situation would exist for any other students who have been reassigned and are not within satellite zones other than Sedgefield or a few other isolated areas. A. Well, as I read the Court order, the Court order talked about a walking distance and I would have assumed that the walking distance that the Board assigned under one plan would be the same as the walking distance that

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the Board assigned under some other plan and so I looked at the Board plan and the estimates of transportation under the Board plan and thought that that must be what the Board assigns as walking distance. So I don't see why the Board assigns two different walking distances under two different plans. So the reason I didn't count those students was because I assumed that they were within walking distance.

Q. Well, it's readily apparent that the students residing in the Alexander Graham attendance district as restructured under the court ordered plan, or your plan, in 402B and 403A reside more than a mile and a half from the school, isn't it? 【80】 About two miles, uh huh.

Q. Wouldn't it be closer to three by road? A. Two and a half to three miles. It's a good walk.

Q. You have overlooked similar students in the other districts, too, have you not? A. If we have, we better detail them so there is no misunderstanding as to what the transportation problem is and what the Court order is.

Q. I ask you address yourself to Smith Junior High School and tell me how many students there. A. When I look at the Board plan I go 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 grids. That's five miles as the crow flies. When I look at the Court ordered plan I see a much more compact attendance zone with a satellite and I have counted the satellite.

Q. You're familiar with the fact that the kids under the Board plan in Smith would be entitled to transportation under State law, are you not? A. No, I wasn't aware of that. They would be?

Q. They would be. A. How come?

Q. It's located in the perimeter area. A. It would be helpful if we had a map with the perimeter area around it.

Q. The Judge requested this. A. Let's not confuse the record, then, on these matters.

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【81】 Q. The point I'm trying to make is that you haven't considered all the students who would be furnished transportation under the Court ordered plan in the figures you have given Mr. Chambers, is that correct? A. I certainly have made fair estimates of the amount of transportation required and when the School Board is claiming that 23,000 students are to be transported, they are making claims made on or based on a set of rules which now appear to be not in the language of the Court.

SHORT RECESS

Q. Dr. Finger, I don't believe you answered my last question. You gave an answer but I don't think it was in direct response to it. Would you read the question back?

(The Court Reporter reads the question in Line 1 above and the answer in Line 5 above.)

Q. That's wholly unresponsive.

Mr. Chambers: That's not good enough?

Mr. Waggoner: No.

Mr. Chambers: What do you want him to say?

Mr. Waggoner: I want him to tell me whether or not these figures are accurate and whether he's considered every student that would be furnished transportation under the court ordered plan. He already indicated that he has not.

Mr. Chambers: That's your interpretation, Mr. 【82】 Waggoner.

A. I have made estimates at the junior high school level that includes students not reported by the school depart-

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ment in their report that was prepared for the Court. As a matter of fact, I have made a range of estimates as to the number of students who might be transported at the junior high school level and I estimate this number to be between 3500 and 4000. Now, I believe to the best of my knowledge and belief that I have counted all of the students and when I reported on the number of buses that would be required, I believe I counted all of those children. To avoid any possibility of misunderstanding, let's just check and make sure. If there are 3500 additional junior high school students to be transported, that would require 78 45-passenger school buses.

Q. Does this assume full capacity use of the buses?
A. I was counting 45 students in a bus, yes, sir. One might assign more students to the bus than the bus would hold.

Q. In making that computation did you consider students who are not in the satellite zones who are reassigned to those junior high schools?

Mr. Chambers: Haven't we gone over that, Mr. Waggoner?

Mr. Waggoner: He comes back with a positive statement this is all that would be required and I'm not going to leave it to conjecture that he has [83] recomputed the thing and added these students back in.

Mr. Chambers: I think the witness testified on two or three different occasions to the same question you have just posed.

Mr. Waggoner: Well, I want to make certain that the record is very clear that this 500 that he has estimated does not include those students who were reassigned and do not reside in the satellite zones.

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Mr. Chambers: He just testified to the contrary.

Mr. Waggoner: He did not. Let him answer the question.

Mr. Chambers: You mentioned harassing. I think the questions that you continually are asking now are purely harassment.

Mr. Waggoner: If I could get straightforward answer from the witness, we could go on.

Mr. Chambers: I think the witness has given straightforward answers.

Mr. Waggoner: We'll let the record speak for itself.

A. Perhaps, Mr. Waggoner, we should go through these junior high schools district by district and count the amount of transportation that would be required so that there is absolutely no misundestading as to what transportation is [84] or is not needed. It is not easy to estimate the amount of transportation since some of the children who will be attending a junior high school under the court ordered plan were riding the school bus to a different junior high school and so there is always the question of when you are talking about a new student going to a junior high school and one who is currently riding a school bus.

Q. It's quite satisfactory with me if we go through the junior high schools school by school. I hope we don't have to do it. A. If we have to clarify the testimony, then I think we should.

Q. I think we should, too. With reference to Albemarle Road, I would like for you to estimate the number of students who will be furnished transportation or additional students who will be furnished transportation under the

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court ordered plan. Do you have your demographic chart with you? A. No.

Q. On what basis can you make such an estimate, then? A. With regard to the Albemarle Road School the original report of the school department on transportation required under State law was 297. Mr. Morgan estimates in his affidavit that there are 267 students to be transported. Now, I believe that when Mr. Morgan is counting these 297 students, he is talking about transporting these students to a school that is outside the city limits and that that's the number of students that [85] he reported being transferred to that school. Another way. . . .

Q. Let me direct your attention to. . . .

Mr. Chambers: Let the witness finish.

A. Another way that I could get that figure would be to read the number of black students assigned to Albemarle Road School. There are 292 black students in Albemarle Road School. Well, I can get my . . . it's right here. At the present time there are 63 black students in Albemarle Road School and I don't have the demographic maps with me. I assume those 63 black students live in that attendance zone. So if I were to make an accurate count of the number of students required to be transported to the Albemarle Road School, it would be essentially those students currently attending Albemarle Road School or some other students eligible for transportation to that school, plus the number of black students residing in that attendance zone. Now, my estimate of the number was 297 but I see that my estimate is on the high side because indeed, 63 black students already go there, so that the correct number of students to be transported might be somewhere more near 239.

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Q. Now, the estimate that you have of 297 and 267 were furnished to you by Mr. Morgan, were they not? A. Yes, sir, that's right.

Q. And you accept them as reliable. A. I don't know that Mr. Morgan submitted the 297. The school **【86】** department was requested to supply those to me. I presume that Mr. Morgan did those. I never questioned Mr. Morgan's reliability.

Q. You do not question him? A. I never have, no, sir. I question the rules under which he was conducting the counting, not his reliability.

Q. Isn't this the basic difference in the counts we're coming up with, Mr. Morgan was using one set of rules, that the Board adopted a policy that they would furnish transportation where permitted by State law so the State would share part of the expense, is this not correct? A. Repeat the question.

(The Court Reporter reads the question on Line 7 above.)

A. It's correct that we were operating under a different set of rules. What else do you want me to say?

Q. Well, I'd like to define these rules so the Court can understand what rules you were operating under and what ones he was operating under, and as I understand your junior high attendance areas you were operating under the rule that you would furnish transportation from the satellite districts only except in a few isolated cases where students seemed to be located long distances from the school you would furnish transportation under your figures. Is that a fair statement? A. Yes.

Q. And that would likewise hold true on the elementary

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and senior **[87]** high schools, too, would it not? A. I was trying to make estimates of the actual amount of transportation that would be required to carry out what I conceived of the desegregation plan.

Q. You made your computations several days ago, is that correct? A. I believe I testified it was even more recently than that.

Q. And you received the Court order last night is that correct? A. That's correct.

Q. And you have just begun to understand the Court order this afternoon.

Mr. Chambers: Can we define which court order you're talking about?

Mr. Waggoner: March 3, amending the February 5 order.

A. I would say it's correct, Mr. Waggoner, that I did not understand why there were the reports on the transportation of 23,000 students that I read in the newspapers.

Q. Read the question back, please.

(The Court Reporter reads the question on Line 9 above.)

A. I just saw it last night for the first time.

Q. And you gained an understanding of it this afternoon, is that correct?

Mr. Chambers: May I inquire what you mean by gaining an understanding of it? From whom?

Mr. Waggoner: Knew what it meant.

[88] Mr. Chambers: As defined by whom?

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Mr. Waggoner: By its own language, satisfactory to himself.

A. Well, it seems to me that the estimates that I have given for transportation are pretty much consistent with the amended court order.

Q. And you're saying the estimates you made before receiving the Court order are still accurate to your satisfaction—as complying with estimates you would make under the Court order. A. I just testified a few moments ago that if we want to improve upon the accuracy of the testimony that I have given that we had better go through the junior high schools one by one and get an accurate estimate of the exact amount of transportation that is required. It's my understanding that the Court has ordered the school department to prepare such plans and that when these plans are prepared we will have a much more accurate estimate of the actual transportation under the Court order than we can get here.

Q. Would you submit that the estimates developed by Mr. Morgan and his staff would be much more accurate than those you have testified to today with respect to defining transportation requirements under the Court order of February 5 and March 3?

Mr. Chambers: How can this witness say that?

Mr. Waggoner: Well, I'm just asking him.

Mr. Chambers: Are you asking him if Mr. Morgan [89] had available the detailed demographic maps to make an estimate or are you asking him to testify that Mr. Morgan is going to tell the truth? I don't think you want to put this witness in that position. It isn't fair to even ask that question.

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Mr. Waggoner: I would like an answer.

Mr. Chambers: I object to the form of the question.

A. I have consistently said from the very outset that the school department is the one most capable of drawing the accurate estimates, the ones most capable of drawing a desegregation plan. The plan that was submitted to the Court was submitted because it was a plan that the school department felt was a feasible one. So my answer to that question would, of course, be yes.

Q. Have you at any time defined for the Court the students whom you would recommend that transportation be furnished by grid numbers of grid code? A. No, I have not.

Q. By any other method? A. No, I have not. The total amount of information submitted to the Court on transportation is this prepared by the school department.

Q. Was this prepared by the school department at your request? A. Yes, it was.

【90】 Q. Was it submitted in this form to the Court? A. It was submitted in this form to the Court with the notation that it should not be part of my report since I could not attest to it.

Q. And did you instruct the Court to remove the transportation information contained on this exhibit that is attached to his court order of February 5? A. I reported to the Court that I had no knowledge about that, that it had been prepared by the school department and that, therefore, I could only provide the Court with whatever it said there and the Court decided that, therefore, it should not be incorporated as part of my report.

Q. Did you have any similar reservations with reference

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to the numbers of students who would be attending the various schools which were also prepared by the school department? A. No, because we counted those together.

Q. You counted those together. A. We counted them so many times you get to be pretty sure of what things are.

Q. Do you have any information as to the total number of students who have been reassigned as a result of the Court order of February 5 as amended? A. Well, we can quickly count the number of students reassigned in the paired schools since those students are in the same attendance zones they were in before. I have not counted [91] the actual number of children who will change schools because of the redrawing of attendance zones at any of the grade levels.

Q. It's a fairly detailed job. A. It's a fairly detailed job. We could obtain that information. In some cases it's a sizeable number. For example, most of the children attending West Charlotte are reassigned. That's the school that has the most reassignment. Independence High School has very few children reassigned.

Q. On what basis did you come to the conclusion that the school department had overestimated the number of students who would need transportation at Smith? I think you testified that 300 would be a more accurate figure than the 413. On what basis did you reach this conclusion? A. Well, I reached this conclusion based on the fact that there are 350 black students assigned to Smith and presumably this is the group count of this satellite here and that these children in the geographic area surrounding Smith would all walk in. I thought that that might be an overestimate. I also noted that . . .

Q. Let me ask you on that, did you have a demographic chart before you at the time you made this estimate? A.

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No, I did not. I also noted that Mr. Morgan, in his second report, noted 360 students in there, so I just questioned that. I didn't make a big thing about it.

【92】 Q. Mr. Chambers asked you about showing residences of the students and that you were only furnished with grids showing the populations within racially. This is not unusual in a system this size to not get information that is broken down by actual location of residences within a school district, is it? A. Well, nothing is really very usual these days in school demographics. I have suggested to the school department that they could probably improve their attendance zoning if they would be able to split those grids into quarters. I'm sure they'll do it if they can find time to do it.

Q. Dr. Finger, in connection with describing the difference in the two plans, I made a note that you testified that you made the ratios of the races equal in all grade levels to the extent you could. Do you recall testifying to that? A. I believe that that falls within my definition of a desegregated school in which I explicitly say by more than 5% of the proportions in all of the schools at that school level.

Q. But you did try to establish a racial ratio, though, you didn't try to establish a racial balance. Would that be a fair statement? A. I tried to define desegregated school and have all schools fall within my definition.

Q. It's obvious I'm not going to get an answer to that one. Dr. Finger, in establishing these ratios or a desegregated 【93】 system, the attendance of any student of either race would be necessary to maintain the level of desegregation in that school, would it not? A. That sounds like a yes question but I'll ask for it to be repeated.

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(The Court Reporter reads the question on Line 25, Page 92.)

A. I guess that would fall under my requirement that the school department should be required to assign and reassign students to maintain desegregated schools.

Q. Dr. Finger, with reference to priorities from an educator's standpoint, would you furnish transportation to the students in districts who need transportation or would you furnish transportation on a long-distance basis—strike that long-distance—on a distant pairing arrangement—I got lost in my question. A. That's good, so did I.

Q. With reference to priorities of furnishing transportation, as an educator would you prefer to furnish in-district transportation to students or furnish transportation in cross busing?

Mr. Chambers: Objection to the form of the question.

A. I don't think I have any druthers on that matter.

Q. If in-district transportation would permit two bus runs per day for shift change, would you prefer in-district busing [94] against cross busing where you could only utilize a bus one way, one trip each school opening or closing? A. I've already testified to the fact that these buses could be used in two different ways on cross busing and there would not be a single run. I have testified to the fact that the buses could either be run a double run at the elementary school level or that there could be sufficient buses for one run on each way with the elementary school children but that the time schedule for junior and senior high schools be such that junior and senior high school students could be transported on the same bus that was used for elementary schools.

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Q. All right. I'll repeat my question and assume that you do not go to staggering of opening of school hours.
A. Well, your question is very ambiguous because I don't know what is meant by in-district busing.

Q. That's the transportation of students to a school in the district in which they live. A. The district in which a student lives is an arbitrary affair. It's anything the School Board makes it.

Q. With reference to the School Board plan or your plan or the Court plan. A. Didn't I already say I didn't have any druthers about that matter?

Q. You didn't say with reference to where a bus could operate two trips per school opening. The other related to one. [95] A. I not only don't understand the question, I don't understand the relevance of the question. I just don't see what you want me to say.

Q. I think it's very obvious that if you can get two children to school instead of one child to school with the same bus is the relevance of the question. A. I was ordered by the Court to prepare a plan that met the Court order.

Q. You were employed as an educational consultant and you testified as an expert in this case and I think I'm entitled to your opinion. A. I have no opinion on that matter.

Q. No opinion. Have your school duties ever involved the procuring of transportation equipment? A. No.

Q. Are you familiar with the delays that are involved in acquiring transportation equipment?

Mr. Chambers: Objection.

A. I read Mr. Morgan's testimony.

Q. Is that the first time you were aware of it?

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Mr. Chambers: I object to that.

A. No. It would be hard to spend twenty-five years in education and not be aware of problems like that.

Q. So they do exist. Now, one point. You started out with 308 buses. How many students would you propose transporting? [96] A. I already testified I was making my calculations based on 45 students per bus. I can multiply this 45 by 308 and I would get 13,800.

Q. This is the number of students that you have calculated would be transported under your figures, is that correct? A. Yes, that's correct. That's the number of additional buses.

Q. Have you driven the nearest routes between the paired schools at the time that buses would ordinarily be transporting students? A. I don't know what time the buses would ordinarily be transporting students.

Q. You suggested 8:00 o'clock. A. I used that only as an illustration.

Q. You also gave us a figure of thirty minutes one way. Do you know if this is accurate? A. No, I don't know. I note that there are some estimates that are made as to the length of time that is required and they run to several hours and I think somebody ought to go out and find out. I think it's true and I think it's important to emphasize one of the things in the testimony and that is some busing transportation include the pickup time. The cross busing does not involve any pickup time, it involves no stops. It does not tie up traffic because they are not stopping to let children on and off the bus.

Q. Well, that depends on whether you pick the students up at the [97] school or whether you pick them up on the route. A. If you pick them up on the route, you're picking

Deposition of John A. Finger March 11, 1970

them up on the route the buses are already picking them up.

Q. Does your thirty-minute estimate cover that time? A. No, it does not.

Q. So it could possibly be another thirty-minute pickup time. A. I have already testified that my estimate was based on the fact that the children would arrive at the school on the pickup bus because in some instances all of the children in an area would be being picked up, 1st, 2nd, 3rd, 4th, 5th, 6th graders. They would arrive at the school together. The 1st, 2nd, 3rd and 4th graders would stay at that school and the 5th and 6th graders would be transported.

Q. Do you find the 5th and 6th graders would be waiting for other buses to come so they could fill the express bus? A. Well, I'm sure Mr. Morgan can work it out so that waiting time would be minimized.

Q. Your experience at schools indicates that school buses arrive sometimes as much as a half an hour apart, does it not? A. Well, in many instances there are going to be more than one bus on the express run, all instances.

Q. I'm speaking with reference to getting the students to the schools. A. They'll arrive at different times.

Q. Are you still of the opinion that the desegregation plan [98] ordered by the Court can be implemented with 109 buses? A. I have testified a number of times that this plan can be initiated section by section and that the accurate estimate of the exact amount of transportation that will be required will best be found out as the plan is implemented and we noted that any one of the pairs could be operated with only a small number of buses. That's another way of saying I do not know the exact number of buses that would be required. We have gone through the various strategies

Deposition of John A. Finger March 11, 1970

that might be followed to reduce the number required and the plan is one that can be implemented on a phased-in basis.

Q. What written communications have you had with the Court in connection with your services as a Court consultant? A. I have written him a couple of personal letters and he has written some to me. I submitted the Court plan. I wrote him a letter after I received the attachments to the Court plan which gave some additional detail on my recommendations relative to that attachment.

Q. Did you make additional recommendations? A. As I read over those recommendations, they seem to be the same as the recommendations submitted in my original report to the Court, but there is another letter that I submitted to him.

Q. That was submitted prior to February 5, is that correct? A. Yes, that's correct. He might not have gotten it by February [99] 5. I read it to him over the telephone. I also submitted a preliminary report which I labeled as a preliminary report for your personal perusal which indicated to him some of the thoughts that I had about the desegregation plans so that he would have some ideas as to what he might expect from me.

Q. Dr. Finger, do you regard the after-school activity of children as being important in their total educational growth? A. Yes.

Q. Do you feel that staggered school hours would interfere with their participation in the after-school activities? A. It wouldn't necessarily. One might be able to devise both curricular and extracurricular activity that took advantage of the staggered hours.

Q. In other words, it would involve more than just dis-

Deposition of John A. Finger March 11, 1970

rupting the school system, it would disrupt a lot of private activities. A. Those are your words, Mr. Waggoner, they are not my words at all.

Q. I'm asking you. A. I did not say that at all. I did not say that at all, Mr. Waggoner. I said that the staggered school hours could be utilized to develop plans that would make use of the staggered school hours.

Q. But it would require changes in other activities, would it not? 【100】 A. It might require some different activities and some different plans.

Mr. Waggoner: I have no further questions.

CERTIFICATE

I, Evelyn S. Berger, Notary Public/Reporter, do hereby certify that Dr. John A. Finger was duly sworn by me prior to the taking of the foregoing deposition; that said deposition was taken and transcribed by me; and that the foregoing 100 pages constitute a true, complete and accurate transcript of the testimony of the said witness. I further certify that the persons were present as stated in the caption.

I further certify that I am not of counsel for, or in the employment of any of the parties to this action, nor am I interested in the results of this action.

In witness whereof, I have hereunto subscribed my name this 14th day of March, 1970.

/s/ EVELYN S. BERGER
Notary Public in and for
County of Mecklenburg
State of North Carolina

**Defendants' Response to Plaintiffs'
Request for Admissions**

(Filed March 13, 1970)

The Defendants Charlotte-Mecklenburg Board of Education et al., acting through William C. Self, Superintendent of the Charlotte-Mecklenburg Public Schools, respond to the Plaintiffs' Request for Admissions as follows, in each instance the paragraph numbers in this Response corresponding to the paragraph numbers in the Plaintiffs' Request:

1. Charlotte City Board of Education and Mecklenburg County Board of Education operated separate school systems until 1961 when they consolidated as the Charlotte-Mecklenburg Board of Education. For a number of years prior to 1961 the County (but not the City) Board of Education operated public school buses to transport students to and from school. In conformity with State law as it existed prior to 1961 and prior to consolidation of the two systems, the Mecklenburg County Board of Education operated and routed school buses in a fashion that some transported only negro students to negro schools and some transported only white students to white schools. By reason thereof, the bus routes of the Mecklenburg County system overlapped and some negro students who may have resided near white schools were transported by such schools to all negro schools and some white students who may have lived near negro schools were transported by such schools to all white schools.
2. See Paragraph 1 hereof for response to Plaintiffs' Paragraph 2.
3. See Paragraph 1 hereof for response to Plaintiffs' Paragraph 3.

*Defendants' Response to Plaintiffs'
Request for Admissions*

4. Prior to 1961 the Charlotte City Board of Education did not operate a public school bus system and, therefore, did not operate public school buses to transport students to and from school, did not transport negro students to negro schools and white children to white schools and did not have bus routes overlapping or otherwise.
5. See Paragraph 4 hereof for response to Plaintiffs' Paragraph 5.
6. See Paragraph 4 hereof for response to Plaintiffs' Paragraph 6.
7. Following the merger of the County and City School Boards in 1961 the consolidated Board provided transportation for students who resided in the portion of Mecklenburg County located outside the city limits as they existed immediately prior to the 1967 annexation who resided more than 1½ miles from the schools to which they were assigned, such transportation being in conformity with that prescribed by State law.
8. That since 1961 and until the closing or reorganization of the 10 all negro schools in the County in 1966, the consolidated Board provided separate bus service for some negro and white students.
9. Pursuant to the Plan approved by the Court in August, 1969, the School Board has provided transportation for approximately 767 inner city black students to be transported to white residential areas of the City and County. These 767 inner city black students are a portion of a much larger number of such students who were granted

*Defendants' Response to Plaintiffs'
Request for Admissions*

by the Board a freedom of choice arrangement pursuant to which they could elect to remain in schools near their homes or to attend schools in the predominately white residential areas. The approximately 767 inner city black students represent those who elected to attend the schools in the predominately white residential areas. The transportation referred to above was made available to such students in order to encourage their attendance at these schools. The approximately 767 inner city black students referred to above in many instances passed other schools serving their grade levels on the way to the schools to which they were assigned pursuant to the above-mentioned freedom of choice arrangement.

/s/ WILLIAM C. SELF
William C. Self

SWORN to and SUBSCRIBED before me this
13th day of March, 1970.

/s/ LILY R. McMAHON
Notary Public
My commission expires:
August 1, 1970

**Submissions to Court in Response to March 6, 1970,
Order and Motion for Extension of Time**

(Filed March 13, 1970)

In compliance with the March 6, 1970 Order of this Court, the information and materials referred to therein (with the exception of Item 2) are attached, in each instance the respective items bearing an identifying number which corresponds to those set forth in that Order.

In addition the following items are submitted: (1) A map showing the pre-1957 city limits, the perimeter areas and rural areas with all senior high schools clearly located on it; and (2) Affidavit of Herman J. Hoose, Director of Traffic Engineering for the City of Charlotte, setting forth the number of vehicles in Mecklenburg County and other related data as requested by this Court on March 2, 1970.

Defendants respectfully move the Court that they be granted an extension of time until Monday, March 16, 1970, for the submission of Item 2 referred to in the March 6, 1970 Order of the Court and the other information requested by the Court of Appeals for the Fourth Circuit in the March 5, 1970 Order.

Respectfully submitted,

/s/ WILLIAM J. WAGGONER
William J. Waggoner

/s/ BENJ. S. HORACK
Benj. S. Horack

Attorneys for Defendants

1015a

ITEM 1

Summary of total number of children who live in the Pre-57 city limits,
Perimeter Area, and Rural Area.

	<u>Pre-57</u>	<u>Perimeter</u>	<u>Rural</u>	<u>Total</u>
Senior High Schools	6073	4429	6080	16,582
Junior High Schools	7411	6365	7499	21,275
Elementary Schools	<u>17,228</u>	<u>11,986</u>	<u>15,790</u>	<u>45,004</u>
GRAND TOTAL	<u>30,712</u>	<u>22,780</u>	<u>29,369</u>	<u>82,861</u>

CHARLOTTE-MECKLENBURG SENIOR HIGH SCHOOLS

Total Number Children who live

		(1) Pre-57		(2) Perimeter		(3) Rural		TOTAL	
		Black	White	Black	White	Black	White	Black	White
	East Mecklenburg	159	401	9	836	39	642	207	1879
	Garrison	381	951	41	908	9	109	431	2048
	Harding	583	457	10	203			593	660
	Independence	45	18	2	13	73	1049	120	1080
	Myers Park	203	1355		358		17	203	1730
	North Mecklenburg			27	6	413	1139	440	1145
	Olympic	80	23	105	30	180	447	365	500
	South Mecklenburg	4	76	19	1197	72	701	95	1974
	West Charlotte	1337		233				1570	
	West Mecklenburg			78	354	58	1052	136	1406
	TOTALS	2792	3281	524	3905	844	5236	4160	12,422

CHARLOTTE-MECKLENBURG JUNIOR HIGH SCHOOLS

Total Number Children who live

	(1) Pre-57		(2) Perimeter		(3) Rural		TOTAL	
	Black	White	Black	White	Black	White	Black	White
Altamere Road				5	63	998	63	1003
Alexander					365	768	365	768
Cochrane		110	43	456	36	984	79	1550
Soulwood			2	31	104	722	106	753
Fastway	57	781	4	560			61	1341
Alexander Graham	101	674	12	334			19	1027
Hawthorne	591	365	5	71			555	436
Kennedy	552		291	6	5		848	6
McClintock	50	38	1	607	42	650	93	1295
Northwest	916		145				1061	
Piedmont	445	51					445	51
Quail Hollow				361	155	1054	155	1425
Randolph	263	98	26	609			289	707
Ranson				83	10	177	538	260
Sedgefield	167	577		224			167	801
Smith	48	2	3	1011	4	421	55	1430
Spann	127	530	153	300			280	830
Williams	868		195	1			1053	1
Wilson				7	809	64	320	71
E-600 (Carmel)								
E-601 (Gunn)								
TOTALS	4125	3225	970	5395	1015	5424	6170	15,105

CHARLOTTE-MECKLENBURG ELEMENTARY SCHOOLS

	Total Number Children who live								TOTAL
	(1) Pre-57	(2) Perimeter			(3) Rural				
	Black	White	Black	White	Black	White	Black	White	
Albemarle Rd.	1	4	2	30	1	486	4	520	
Allenbrook				191	61	244	61	435	
Ashley Park	1	545	26	4			27	549	
Bain					33	739	33	739	
Berringer	698		194	16			892	16	
Berryhill				8	10	105	653	114	663
Beverly Woods	66			102	2	589	68	691	
Billingsville	563		14				607		
Briarwood			6		676	12	682	12	
Bruno Ave.	789	10					789	10	
Chantilly	5	478					5	478	
Clear Creek					51	252	51	252	
Collinswood	72	111	374			12	111	458	
Cornelius					195	245	195	245	
Cotswold	16	4	7	538			23	542	
Davidson					104	183	104	183	
Marie Davis	663		18				681		
Dorite					163	684	163	684	
Devonshire		400		478		24		902	
Dilworth	119	346					119	346	
Double Oaks	805						805		
Druid Hills	400		56	3			456	3	
Fairhaven	42	497		55			42	552	
Elizabeth	367	151					367	151	
Federly Park	3	209		90			3	379	

	(1) Pro-57		(2) Perimeter		(3) Rural		TOTAL	
	Black	White	Black	White	Black	White	Black	White
First Ward	805	0					805	
Hickory Grove					70	534	70	534
Hidden Valley				1059		32		1091
Highland	80	305					80	305
Hoskins			17	228			17	228
Huntersville					154	534	154	534
Hunt. Farms					419	7	168	7
Idlewild	53				92	2	501	55
Irvin Ave.	304	0					304	
Amey Jones			253		235	3	488	3
Lakeview	270	72	100	30			370	102
Lansdowne	72	75 $\frac{1}{2}$	3	1			75	795
Lincoln Heights	308		395				703	
Long Creek					270	468	270	468
Matthews					86	814	86	814
Merry Oaks		414		47				461
Midwood	21	487					21	487
Montclaire					712			712
Myers Park Elem.	27	471					27	471
Nations Ford					47	686	47	686
Newell					74	447	74	447
Oakdale					69	50 $\frac{1}{2}$	69	50 $\frac{1}{2}$
Oakhurst	4	3	1	598			5	601
Oaktown	620						620	
Olde Providence	76				4	489	80	489

	(1) Pre-57		(2) Perimeter		(3) Rural		TOTAL	
	Black	White	Black	White	Black	White	Black	White
Park Road	44	259		294			44	553
Paw Creek					27	595	27	595
Paw Creek Annex					30	266	30	266
Pineville					146	377	146	377
Pinewood				663				663
Plaza Road	6	258	83	104			89	362
Rawa Road			1	393		410	1	803
Sedgefield Elec.	3	557					3	557
Silvyn	31	37		566		22	31	625
Shamrock Edns.		366		145				511
Sharon	86			92	3	245	89	337
Starmount				687	25	21	25	708
Statesville Rd.			113	49	220	463	333	512
Steele Creek					5	533	5	533
Ihnotashoro				658				658
Troy Hills	311		11	152		12	322	164
Tuckaseegee					58	579	58	579
University Pk.	716		116	1			832	1
Villa Heights	968	88					968	88
Westerly Hills			45	492		40	46	532
Wilmore	260	232					260	232
Windsor Park		318	1	429			1	747
Winterfield	48	120		572			48	692
TOTALS	9651	7577	1612	10,374	2924	12,856	14,187	30,817

1021a

ITEM 3

AVERAGE DAILY NUMBER PUPILS RIDING SCHOOL BUSES

	Oct. 2 Oct. 29	Oct. 30 Nov. 26	Dec. 1 Jan. 7	Jan. 8 Feb. 11
HIGH SCHOOLS	4574	4293	4269	4193
JUNIOR HIGH SCHOOLS	8841	8847	8805	8729
ELEMENTARY SCHOOLS	10237	10150	10130	10201
TOTALS	23652	23290	23205	23126

ITEM 3

1022a

AVERAGED DAILY ENROLLMENT RIDING SCHOOL BUSES

CHARLOTTE-MECKLENBURG SENIOR HIGH SCHOOLS

	Oct. 2 Oct. 29	Oct. 30 Nov. 26	Dec. 1 Jan. 7	Jan. 8 Feb. 11		
East Mecklenburg	621	587	584	585	-	
Garinger	306	305	290	339		
Harding	162	176	176	158		
Independence	182	155	155	145		
Myers Park	112	151	115	135		
North Mecklenburg	637	633	683	747		
Olympic	123	123	123	103		
South Mecklenburg	920	905	905	825		
West Charlotte	17	17	17	26		
West Mecklenburg	633	550	550	505		
Nevins				22		
TOTALS	4574	4293	4269	4193		

AVANCED HIGH JUNIOR POLICE RIDING SCHOOL ROLL

CHARLOTTE-MECKLENBURG JUNIOR HIGH SCHOOLS

	Oct. 2 Oct. 29	Oct. 30 Nov. 26	Dec. 1 Jan. 7	Jan. 6 Feb. 7		
Albertic Reed	714	693	669	720		
Alexander	1037	1053	1053	1009		
Cochran	638	632	637	672		
Conrad	516	518	503	511		
Eastway	68	67	65	64		
Alexander Graham	99	102	102	103		
Westmore	12	12	12	12		
Kennedy	135	135	135	129		
McLinton	634	655	655	635		
Murchison						
Piedmont				15		
Quail Valley	1305	1203	1203	1214		
Randolph	151	594	103	303		
Sanson	562	569	555	500		
Sedgefield	70	60	60	75		
Smith	673	673	673	679		
Spanich	215	336	336	274		
Villanova	77	76	76	69		
Wilson	944	879	879	947		
F-600 (carrot)						
F-601 (carrot)						
TOTALS	6341	6317	6306	6729		

AVERAGE DAILY NUMBER PUPILS RIDING SCHOOL BUSES

CHARLOTTE-MECKLENBURG ELEMENTARY SCHOOLS

	Oct. 2 Oct. 29	Oct. 30 Nov. 26	Dec. 1 Jan. 7	Jan. 6 Feb. 11		
Albemarle Rd.	325	276	276	219		
Allenbrook	96	88	88	90		
Ashley Park	26	27	27	25		
lein	621	607	607	609		
Carringer						
Berryhill	477	474	474	518		
Beverly Woods	303	305	305	298		
Bullingsville						
Carmwood	145	145	145	137		
Camps Ave.						
Chantilly				12		
Clear Creek	221	215	215	185		
Collinswood	82	81	95	96		
Cornelius	208	207	207	206		
Cotswold	40	39	39	38		
Didsco	15	61	61	61		
MARIE DAVIS						
PERITA	393	363	363	372		
DEVONSHIRE	93	93	99	95		
BILWORTH						
Double Oaks						
Hill Hills						
Holmes	20	20	20	20		
Litchfield	21	21	24	23		
Wardley Park						

	Oct. 2 Oct. 29	Oct. 30 Nov. 26	Dec. 1 Jan. 7	Jan. 6 Feb. 11			
First Ward							
Hickory Grove	385	385	385	400			
Hidden Valley	61	61	61	61			
Highland							
Hoskins							
Huntersville	102-	399	359	104			
Hunt. Farms	83	85	86	70			
Idlewild	214	211	211	213			
Irvin Ave.							
Amey James	185	178	178	187			
Lakeview							
Lansdowne	234	227	227	223			
Lincoln Heights							
Long Creek	596	593	598	593			
Matthews	603	553	550	562			
Merry Oaks							
Midwood				1			
Montclaire							
Myers Park Elec.				16			
Nations Ford	547	554	551	542			
Newall	384	429	499	403			
Oakdale	301	283	283	290			
Oakhurst	37	37	37	35			
Oaktown							
Old Providence	183	183	183	167			

	CNT 2 Oct. 26	CNT 3 Nov. 26	CNT 4 Jan. 7	CNT 5 Feb. 13			
Park Road	101	100	100	94			
Fox Creek	482	449	455	445			
Fox Creek Annex	111	128	128	134			
Pineville	142	149	150	134			
Pinewood							
Ezra Road	26	26	28	28			
Ridge Road	112	114	114	136			
Sedgefield Flats	6	6	6	5			
Selway	392	103	103	99			
Shearrock Grds.							
Sharon	155	155	155	143			
Starburst	30	33	33	23			
Statesville Rd.	669	639	639	770			
Stiles Creek	141	152	152	136			
Thomastown							
Tryon Mills	71	71	71	71			
Tuckaseegee	293	254	267	276			
University Pk.							
Villa Heights							
Westerly Hills	62	62	62	67			
Wilmore				8			
Windsor Park							
Winterfield	42	40	40	40			
557MS	10237	10130	10130	10201			

ITEM 4

With respect to the schools whose students are to be desegregated under the court ordered plan by rezoning:

	1-1/2 Miles Radius of School	2 Miles Radius of School
High Schools	2,067	3,589
Junior High Schools	5,921	9,074
Elementary Schools	9,671	11,559
TOTALS	17,659	24,222

1028a

ITEM 4

CHARLOTTE-MECKLENBURG SENIOR HIGH SCHOOLS

	1½ Miles	2 Miles				
East Mecklenburg	25	271				
Garinger	538	907				
Harding	364	562				
Independence	15	110				
Myers Park	392	759				
North Mecklenburg	5	21				
Olympic	10	31				
South Mecklenburg	5	134				
West Charlotte	693	754				
West Mecklenburg	20	40				
TOTALS	2067	3589				

CHARLOTTE-MECKLENBURG JUNIOR HIGH SCHOOLS

	1½ Miles	2 Miles			
Altemarle Road	104	184			
Alexander	10	49			
Cochrane	556	771			
Coultwood	214	275			
Eastway	432	637			
Alexander Graham	384	593			
Hawthorne	409	611			
Kennedy	225	329			
McMillenock	250	363			
Northwest	235	344			
Findmont	310	530			
Quail Hollow	6	163			
Randolph	448	829			
Ranson	86	159			
Sedgefield	449	632			
Smith	646	773			
Spraub	467	730			
Willowis	334	367			
Wilson	132	221			
E-600 (Carroll)	115	180			
E-601 (Gunn)	109	157			
TOTALS	5921	5974			

CHARLOTTE-MECKLENBURG ELEMENTARY SCHOOLS

	1½ Miles	2 Miles			
Albemarle Rd.					
Allenbrook					
Ashley Park	379	521			
Bain					
Barringer	231	498			
Berryhill	137	231			
Beverly Woods					
Billingsville	179	238			
Briarwood					
Bruno Ave.					
Chantilly	475	475			
Clear Creek					
Collinswood	504	616			
Cornelius					
Cotswold	382	462			
Davidson					
Marie Davis					
Darita					
Devonshire					
Dilworth	592	617			
Double Oaks					
Druid Hills					
Eastover	398	471			
Elizabeth	311	406			
Enderly Park	386	420			

	1½ Miles	2 Miles			
First Ward					
Hickory Grove					
Hidden Valley					
Highland	313	313			
Hoskins	363	363			
Huntersville					
Hunt, Farms					
Idlewild					
Irvin Ave.					
Anny James	127	128			
Lakeview	419	419			
Lansdowne					
Lincoln Heights					
Long Creek					
Matthews					
Merry Oaks					
Hillwood	513	517			
Montclaire					
Myers Park Elem.	281	464			
Nations Ford	25	28			
Newall					
Oakdale	266	374			
Oakhurst	731	731			
Collegem					
Old Providence					

	$\frac{1}{4}$ Miles	$\frac{1}{2}$ Miles			
Park Bend					
Paw Creek					
Paw Creek Annex					
Fincastle					
Fincafe					
Eldorado	531	531			
Santa Fe					
Sedaliafield flsp.	389	587			
Selkirk					
Shenandoah Gdns.	367	467			
Shorea					
Stonewall					
Statesville, Et al.					
Steels Creek	11	58			
Theobald	654	725			
Troy Hills					
Lockwood					
University, Et al.					
Villa Heights					
Westerly Hills	339	476			
Wilmore	348	403			
Windsor Park					
Winterfield					
TOTALS	3,671	11,559			

L. G.
1033a

JOE W. GARNETT
COMMISSIONER

JOHN N. LOCKHART
J. M. PERIN
ASST. COMMISSIONERS

State of North Carolina
Department of Motor Vehicles
Raleigh 27602

March 10, 1970

Mr. Floyd Bass
Citizens Safety Asso.
301 St. Bernard St.
Charlotte, N.C.

Dear Mr. Bass:

During 1969 there were some 1806 traffic deaths in North Carolina. There were 58610 reported personal injuries during that year.

School age children are defined by me as those from 7 to 14 years old, inclusive.

There were some 136 of these children killed; 56 were pedestrians, 17 were bike riders, 4 were operating motor vehicles and the remaining 59 were vehicle passengers.

Approximately 4400 of the injured were in the defined age bracket; 580 were pedestrians, 475 were bike riders, 83 were operating a motor vehicle and the remainder were passengers.

During the 1968-1969 school year there were 330 school bus pupil passengers of all ages reported injured. One school bus pupil passenger was killed; six additional students were struck and killed by school buses; 21 were injured in a like manner.

Very truly yours,

Joe K. Register
Joe K. Register
Statistical Analyst
Driver Education and
Accident Records Division

JKR:aj



Published by the
NATIONAL SAFETY COUNCIL
 425 N. Michigan Avenue
 Chicago, Illinois 60611

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DEFINITIONS INSIDE BACK COVER

The detailed analysis of accidents in this booklet was made possible by the cooperation of the following organizations, and of many companies and individuals: Vital statistics and traffic authorities of cities and state-social insurance organizations; authorities; U. S. Bureau of the Census, National Center for Health Statistics, Bureau of Railroad Safety, Bureau of Home Protection and Safety Agency, National Transportation Safety Board, Bureau of Mines, Bureau of Labor Statistics, Canadian Bureau of Statistics; World Health Organization; insurance companies; trade associations; schools and community safety councils.

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Printed in the U.S.A. 57M4692



1969 EDITION

SCHOOL-CHILD ACCIDENTS, 1960

Residential deaths and death rates of children 5-14 years
(See page 11 for effect of ICD Eighth Revision on death totals.)



	Deaths	Rate*
TOTAL	8,109	20.3
Motor-vehicle	4,200	10.2
Pedestrian	1,900	4.6
Home	1,109	3.1
Public non-motor-vehicle	2,600	6.3
Work	200	0.5

*Deaths per 100,000 population.

Totals by class of accident as shown above are not available for other age groups, but total deaths are shown below (1967 latest available). See also pages 8, 9 and 51.

Deaths and Death Rates by Age, 1967

Age Group	1967		Changes in Rates	
	Deaths	Rate*	1966-1967	1953-1957
5 to 4 years	8,074	32.1	+ 4%	- 57%
5 to 9 years	4,010	18.0	- 6%	- 81%
10 to 14 years	3,861	19.6	+ 1%	- 41%
15 to 19 years	11,025	61.2	+ 3%	+ 21%
20 to 24 years	10,699	76.8	+ 7%	+ 43%

*Deaths per 100,000 population in each age group.

High school driver education

Participation in driver education has been increasing steadily since 1960, as shown in the table below. Eligible students are those enrolled in the grade level in which the most students are enrolled in driver education; eligible schools are the number of high schools that house these grade levels. The participation figures cover courses which consist of at least 30 clock hours of classroom instruction and 6 clock hours of laboratory instruction—in car or simulator.

Participation in Driver Education, 1960-1968

Year	Student Participation			School Participation		
	Eligible (000)	Enrolled (000)	% of Elig.	Eligible	Offering Courses	% of Elig.
1960-61	2,051	814	39%	15,310	8,759	57%
1961-62	2,236	1,011	45%	18,169	10,277	56%
1962-63	2,782	1,057	39%	17,933	10,756	60%
1963-64	2,932	1,256	42%	19,155	11,431	60%
1964-65	2,971	1,332	45%	17,503	11,536	65%
1965-66	2,595	1,310	50%	18,103	12,771	71%
1966-67	3,093	1,725	56%	17,954	13,711	74%
1967-68	3,079	1,953	63%	17,219	13,713	81%

Source: Insurance Institute for Highway Safety.

SCHOOL - 89

PEDESTRIAN AND BICYCLE ACCIDENTS SUMMARY

PRE-SCHOOL AND SCHOOL AGE CHILDREN

1969

Pre-School Children (Ages 0 through 5)

<u>Time</u>	<u>Total</u>	<u>Fatalities</u>	<u>Bicycle</u>	<u>Pedestrian</u>
8:00 a.m. - 4:00 p.m.	12	0	1	11
4:01 p.m. - 12:00 a.m.	20	0	1	19
12:01 a.m. - 7:59 a.m.	0	0	0	0
TOTAL	32	0	2	30

School Age Children (Ages 6 through 19)

<u>Time</u>	<u>Total</u>	<u>Fatalities</u>	<u>Bicycle</u>	<u>Pedestrian</u>
8:00 a.m. - 4:00 p.m.	70	4	23	43
4:01 p.m. - 12:00 a.m.	99	3	30	66
12:01 a.m. - 7:59 a.m.	4	0	0	4
TOTAL	173	7	53	123

The records showed City school enrollment increased 1.6% in 1969. Only one child was injured within the scope of our Safety Patrol and Crossing Guard program and only 19 other children were injured while in the process of going to or coming from school. This was 9.5% of the total amount of children injured in the City of Charlotte.

Education and supervision in bicycle and pedestrian safety rules has certainly been the key element for the decrease in this year's report. This yearly report shows that 123 accidents occurred after school hours. We realize, in order to eliminate the majority of these accidents, action must come from parents or supervisory personnel.

PLEASE BE A DEFENSIVE DRIVER WHERE YOU SEE CHILDREN; SLOW DOWN AND LET THEM LIVE

COMPARISON

	<u>1968</u>	<u>1969</u>
Enrollment	51,599	52,067
Parochial Enrollment	2,024	2,462

- 2 -

COMPARISON (cont'd.)

	<u>1968</u>	<u>1969</u>
Injured	220	205
Fatalities	8	7
Summer Accidents	58	49

PERCENTAGE OF CHANGES OVER PREVIOUS YEAR

Pre-school	- decrease	30.2%
School ages	- decrease	.05%
Bicycle	- decrease	8.6%
Fatalities	- decrease	12.6%

**Affidavit of Herman J. Hoose, Director of Traffic
Engineering for the City of Charlotte, North Carolina**

(Referred to in Foregoing Submission)

HERMAN J. HOOSE, being duly sworn, deposes and says that:

1. I am now, and have been for the past 22 years, Director of Traffic Engineering for the City of Charlotte. I am charged with primary responsibility for all matters relating to traffic on city streets and thoroughfares. By reason of my position, I also thoroughly familiar with matters relating to traffic in the portions of Mecklenburg County located outside the city limits. Various studies have been made under my direction and control regarding the vehicular traffic and related matters in both Charlotte and the balance of Mecklenburg County, North Carolina.
2. As of April, 1969, the total number of registered motor vehicles in Mecklenburg County, North Carolina, was 183,362, of which 160,862 were passenger vehicles and 22,500 were trucks. Based upon past experience, it is estimated that there has been a 5% increase during the one year interval since the foregoing figures were tabulated. Based upon this increase the total of such registered vehicles is now approximately 192,530, of which 168,905 are passenger vehicles and 23,625 are trucks.
3. In the summer of 1967, a survey was prepared (with the assistance of my Department) by the Planning and Research Department, North Carolina State Highway Department, Raleigh, North Carolina, entitled "External Origin & Destination Survey for Charlotte, N. C." The boundaries of the survey area covered by this study and

*Affidavit of Herman J. Hoose, Director of Traffic
Engineering for the City of Charlotte, North Carolina*

report are roughly (but not quite) the same as those of Mecklenburg County. It was the purpose of this survey to identify the total number of vehicles that daily enter and pass through the survey area (these trips being denominated as Class A trips) and the total number of vehicles that daily come from outside the survey area to a termination destination point within the survey area (these trips being denominated as Class B trips). The results of this survey (in the summer of 1967) are as follows:

Class A Trips (i.e., through traffic)	13,285
Class B Trips (i.e., to and from points of origin outside the survey area)	55,580

Based on past experience, each of these trip categories increases about 5% per year—resulting in about a 10% increase since the 1967 survey was made. With this increase, the current Class A Trips are about 14,613 and Class B Trips about 61,138. The Class B trips are predominately those by persons who live outside Mecklenburg County and have jobs in Charlotte and Mecklenburg County. Most of these Class B trips are during the morning (7:30 to 9:30 a.m.) and evening (4:30 to 6:30 p.m.) rush hours when local traffic is at its peak. The Class A trips are primarily those of the traveling public passing through Charlotte and Mecklenburg County. A major portion of these Class A trips are also made in the morning and evening rush hours, resulting primarily from the fact that travelers make a local stopover at local hotels and motels in the evening and continue on their way the next morning.

*Affidavit of Herman J. Hoose, Director of Traffic
Engineering for the City of Charlotte, North Carolina*

4. With reference to strictly internal traffic (i.e., making trips to and from points entirely within Mecklenburg County) studies made by my Department show that as of November 1969 there were approximately 102,000 occupied dwelling units in Mecklenburg County, that each dwelling units owns 1.55 passenger automobiles and makes 7.4 trips per day or 4.7 trips per vehicle per day. This means that the locally registered passenger cars (currently estimated to be 168,905) makes about 793,853 internal trips per day (i.e. 168,905 cars x 4.7 trips per car).

5. A summary of the currently estimated number of trips per day in Charlotte and Mecklenburg County is as follows:

Class A Trips (see Para. 2 above)	14,613
Class B Trips (see Para. 2 above)	61,138
Internal Trips by Autos (see Para. 4 above)	793,853
Total (exclusive of internal truck trips)	869,604

HERMAN J. HOOSE

**Submissions to Court in Response to
March 6, 1970 Order**

(Filed March 6, 1970)

In compliance with the March 6, 1970 Order of this Court the Defendant Charlotte-Mecklenburg Board of Education submitted all of the information and maps required by that Order with the exception of the data and information identified in Paragraph 2 thereof. The data and information specified in that Paragraph 2 (and related matters), as interpreted by the Defendants, is now submitted herewith together with an affidavit of William C. Self, Superintendent of Charlotte-Mecklenburg Public Schools.

Respectfully submitted this 17 day of March, 1970.

/s/ WILLIAM J. WAGGONER
William J. Waggoner

/s/ BENJ. S. HORACK
Benj. S. Horack

Attorneys for Defendants

**Affidavit of William C. Self, Superintendent of
Charlotte-Mecklenburg Public Schools**

(Referred to in Foregoing Submission)

WILLIAM C. SELF, being duly sworn, deposes and says that:

1. I am the Superintendent of the Charlotte-Mecklenburg Public Schools.
2. On Monday a. m., March 9, 1970, I received a copy of the Order of the District Court dated March 6, 1970, in which the School Board was directed to furnish the data, information and maps described in the 8 paragraphs of that Order. Immediately upon receipt of that Order I, together with members of my administrative staff and other school personnel, began to assemble the requested information and data and to prepare the maps. In an effort to meet the prescribed March 13, 1970 deadline, the administrative staff and other personnel worked both day and night.
3. On March 13, 1970, all of the information, data and maps requested by the March 6, 1970, Order were filed with the District Court with the exception of the information designated as Item 2 in that Order. When the submission of the other items were made the Court was advised that additional time was necessary to assemble the facts and figures required by that Paragraph 2.
4. The staff was advised by the School Board attorneys that the information requested by that Paragraph 2 related to the numbers of children in each school in the entire system who under the Court approved Plan will live in a different zone from that of the school they attended in

*Affidavit of William C. Self, Superintendent of
Charlotte-Mecklenburg Public Schools*

January 1970. After many hours of preparing the data on that phase and checking and double checking its accuracy in conformity with what the staff understood Paragraph 2 to require, the information has now been completed and is being submitted to the District Court.

5. During the morning of March 17, 1970, I was advised through our attorneys that the Court had stated that Paragraph 2 of his March 6, 1970, Order has been misinterpreted and that the Court now advises that Paragraph 2 was not intended to relate to the zones under the Court approved Plan, but on the contrary made inquiry of the numbers of children in each school who now live in a different zone from that of the school they attended in January 1970—with a designation of those who are supplied transportation and those who are not supplied transportation.

6. Immediately upon receipt of this advice, I made inquiry to ascertain whether this information was available, from whom it would need to be acquired and what would be involved in preparing a tabulation. I am advised that this information and data can be supplied only by utilizing computer print outs and a manual analysis of them and by the principals of the different schools who will first have to make an analysis of their school records and a head count of those who are and are not afforded transportation.

7. Both the administrative staff and the school principals have been and are now involved in the laborious task of conforming grid lines to suitable natural monuments as one of the major undertakings required in order to be in readiness to implement the Court Plan at the elementary level by the prescribed April 1, 1970 deadline.

*Affidavit of William C. Self, Superintendent of
Charlotte-Mecklenburg Public Schools*

8. Because of the heavy involvement of the staff, the principals and other school personnel in the efforts to implement the Court Plan, superimposed upon the time consuming task of assembling the other information requested by the March 6, 1970, Order, I respectfully state that it is not humanly or physically possible to assemble and furnish the Paragraph 2 information in time to meet the Court prescribed deadline. In view of the foregoing, we respectfully request the Court's guidance as to what it wants us to do in view of this dilemma.

WILLIAM C. SELF

**Affidavits of J. D. Morgan, Ralph Neill
and J. W. Harrison**

(Referred to in Foregoing Submission)

Each of the undersigned being duly sworn deposes and says that:

1. His position with the Charlotte-Mecklenburg School System is as indicated below.

2. From March 9, 1970 to March 17, 1970 a total of not less than 650 man hours were expended by school personnel in obtaining and tabulating the information and preparing the maps requested in the March 6, 1970 order of the District Court. These persons include the following:

J. D. Morgan—Assistant Superintendent—Business Services;

Ralph Neill—Adm. Assistant—Auxiliary Services;

John Hansil—Adm. Assistant Physical Plant;

J. W. Harrison—Director of Transportation;

Carroll York—Director of Planning and Sites Development;

H. L. Puckett—Director of School Construction;

Julian Carter—Site Engineer;

Ron Reavis—Draftsman;

Wayne Church—Director of Research;

Don Baucom—Assistant Director of Transportation;

Bill Harrison—Transport Spec.

*Affidavits of J. D. Morgan, Ralph Neill
and J. W. Harrison*

3. He is thoroughly familiar with those information and maps which have been submitted to the court pursuant to the order including item arabic 2 and its attachments and states that they correctly portray information which they purport to convey. Any estimates and projections being based on the actual past experience of the Charlotte-Mecklenburg School System.

North Carolina
Mecklenburg County

This 17th day of March, 1970 came before me the following and who being duly sworn acknowledged the afore as true statements:

/s/ J. D. MORGAN
J. D. Morgan

/s/ RALPH E. NEILL
Ralph E. Neill

/s/ J. W. HARRISON
J. W. Harrison

WITNESS my hand and Notarial Seal.

/s/ RUTH VON CANON
Notary Public

My commission expires: April 24, 1970

ITEM 2

**Summary of total number of children in each school in
the entire system who will live in a different zone
under the court approved plan from that they attended
in January of 1970.**

	<u>Live in Rezoned Area</u>	<u>Now Trans- ported</u>	<u>Add'l to Trans- port (1)</u>	<u>Not to be Trans- ported</u>
Senior High Schools	5,292	3,008	2,197	87
Junior High Schools	6,696	4,522	1,599	575
Elementary Schools	6,472	1,486	2,223	2,703
GRAND TOTAL	18,460	9,016	(2) 6,019	3,425

- NOTE: (1) Additional transportation provided under Court Plan for each child who lives more than 1-1/2 miles from his school and who has been reassigned (rezoned) to a different school than the one previously attended.
- (2) A substantial number of these children will be transported a greater distance under the Court Plan than is presently the case.

Item 2

NUMBER OF CHILDREN WHO WILL LIVE IN A DIFFERENT
ZONE FROM THAT THEY ATTENDED IN JAN. 1970

THE CHARLOTTE-MECKLENBURG
SENIOR HIGH SCHOOLS

	1969 - 1970				
	Live in Rezoned Area	Now Trans- ported	Additional to Trans- port	Not to be Trans- ported	
East Mecklenburg	469	4	465	0	
Garinger	836	365	471	0	
Harding	258	188	45	25	
Independence	211	211	0	0	
Myers Park	411	96	308	7	
North Mecklenburg	47	47	0	0	
Olympic	659	643	16	0	
South Mecklenburg	561	149	412	0	
West Charlotte	1409	1135	219	55	
West Mecklenburg	431	170	261	0	
	5292	3008	2197	87	

Item 2

NUMBER OF CHILDREN WHO WILL LIVE IN A DIFFERENT
ZONE FROM THAT THEY ATTENDED IN JAN. 1970

CHARLOTTE-MECKLENBURG JUNIOR HIGH SCHOOLS

	Live in Rezoned Area	Not Trans- ported	Additional to Trans- port	Not to be Trans- ported
Altomeric Road	220	156	0	24
Alexander	49	49	0	0
Cochrane	159	68	91	0
Colwell	212	75	137	0
Jasenay	158	140	0	18
Alexander Street	50	16	30	4
Hawthorne	205	39	135	31
Kennedy	576	457	58	51
Magnolia	76	50	26	0
Northwest	783	699	97	6
Pinecroft	516	0	516	43
Quail Hollow	201	201	0	0
Randolph	275	243	32	20
Nelson	395	355	0	0
Sedgwick	317	29	245	43
Smith	183	141	42	0
Spank	391	138	253	0
Willow	879	862	0	12
Wilson	148	118	0	0
E-FCC (Facet)	368	135	0	233
E-LOL (Facet)	521	434	0	90

Item 2

NUMBER OF CHILDREN WHO WILL LIVE IN A DIFFERENT
ZONE FROM THAT THEY ATTENDED IN JULY, 1970

CHARLOTTE-MECKLENBURG ELEMENTARY SCHOOLS

	Live in Rezoned Area	Now Trans- ported	Additional to Trans- port	Not to be Trans- ported
Albemarle Rd.	0	0	0	0
Allenbrook	63	0	33	30
Ashley Park	274	0	221	53
Fain	0	0	0	0
Barringer	288	35	205	48
Terry Hill	467	193	274	0
Beverly Woods	0	0	0	0
Billingsville	272	112	128	32
Briarwood	0	0	0	0
Brunswick Ave.	0	0	0	0
Chantilly	0	0	0	0
Clear Creek	0	0	0	0
Collinswood	253	0	224	29
Coronelius	0	0	0	0
Corsicana	269	63	0	206
Davidson	0	0	0	0
Darin Davis	8	0	0	8
Delita	0	0	0	0
Desashire	0	0	0	0
Dilworth	52	0	0	52
Double Oaks	0	0	0	0
Dowd Hills	0	0	0	0
Eastover	351	7	42	302

	Live in Rezoned Area	No. of Trans- ferred	Addition to Trans- ferred	Total Trans- ferred
First Ward	0	0	0	0
Hickory Grove	0	0	0	0
Hidden Valley	0	0	0	0
Highland	7	0	0	7
Hoskins	293	0	0	293
Huntersville	0	0	0	0
Hunt. Farms	0	0	0	0
Idlewild	0	0	0	0
Irvin Ave.	0	0	0	0
Amay James	195	195	0	0
Lakeview	231	0	0	231
Lansdowne	0	0	0	0
Lincoln Heights	0	0	0	0
Long Creek	0	0	0	0
Matthews	0	0	0	0
Merry Oaks	0	0	0	0
Midwood	83	0	0	83
Montclaire	0	0	0	0
Myers Park Elem.	236	4	153	70
Nations Ford	279	78	201	0
Newell	22	22	0	0
Oakdale	186	186	0	0
Oakhurst	118	0	0	118
Oaklyn	0	0	0	0
Olde Providence	0	0	0	0

	Live in Rezoned Area	Now trans- ported	Additional to Tran- sport	Not to be trans- ported
Fair Road	0	0	0	0
Fay Creek	0	0	0	0
Fay Creek Annex	0	0	0	0
Pineville	0	0	0	0
Firewood	375	375	0	0
Eliza Road	249	0	0	249
Bona Road	0	0	0	0
Sedgfield Elm	259	0	164	95
Selwyn	0	0	0	0
Shawnee Oaks	302	39	45	- 218
Sharon	0	0	0	0
Siemens	0	0	0	0
Somersville	0	0	0	0
Steele Creek	295	176	119	0
Thomestown	213	0	94	119
Ticon Hills	0	0	0	0
U.S.A. Center	0	0	0	0
University Park	0	0	0	0
Villa Heights	0	0	0	0
Westerly Hills	200	0	140	60
Wilmore	149	0	71	78
Windsor Park	0	0	0	0
Winterfield	0	0	0	0
	6472	1496	2223	2763

* Does not include pupils now transported from inner-city closed schools 7-1-69.

1053a

TOTAL NUMBER OF STUDENTS FOR WHICH ADDITIONAL
TRANSPORTATION IS REQUIRED BY THE COURT ORDERED PLAN

CHARLOTTE - MECKLENBURG SCHOOLS

SCHOOLS	NO. STUDENTS PAIRED SCHOOLS	NO. STUDENTS SATELLITE SCHOOLS	NO. STUDENTS RELOCATED SCHOOLS	TOTAL N STUDENTS RE TRANSPORT.
Senior		300	2,197	2,497
Junior		2,760	1,599	4,359
Elementary	10,206		2,223	12,429
TOTAL	10,206	3,060	6,019	19,285

1054a

**TOTAL NUMBER OF STUDENTS FOR WHICH ADDITIONAL TRANSPORTATION IS
REQUERED BY THE COURT ORDERED PLAN**

CHARLOTTE-MECKLENBURG JUNIOR HIGH SCHOOLS

	School	Selected	Rejected	Total			
	East Mecklenburg		465	465			
	Gwinnett		471	471			
	Henderson		45	45			
	Zebulon - Zebulon						
	Independence - 318 A	300	0	300			
	Myers Park		305	305			
	North Mecklenburg		0	0			
	Oliver		16	16			
	South Mecklenburg		412	412			
	West Charlotte		212	212			
	West Mecklenburg		261	261			
	TOTAL	360	2,197	2,557			

1055a

CHARLOTTE COUNTY, FLA., 1960.

	Satellite	Residence	Total		
Altona	257		257		
Alexander					
Cochrane	303	91	394		
Coulwood		137	137		
Eastway	354		354		
Alexander-Graham	374	30	404		
Hawthorne		135	135		
Kennedy		58	58		
Mellicock	355	26	381		
Northwest		97	97		
Piedmont		473	473		
Quail Hollow	274		274		
Dandolph		12	12		
Ranson					
Sedgefield		245	245		
Smith	402	42	444		
Sprout		253	253		
Willards					
Wilson	163		163		
F-100 (Farm)	218		218		
F-101 (Guan)					
	2,766	1,592	4,358		

INFORMATION IS RE-FILED BY THE COUNTY DIRECTOR FOR

CHARLOTTE-MECKLENBURG ELEMENTARY SCHOOLS

1056a

	ENROLLED	REMOVED	FINAL				
Alvinston	175		175				
Bellbrook	159	33	126				
Bolton Park		221	221				
Bain							
Burringer		205	205				
Berryhill		274	274				
Berkeley Woods	250		250				
Billingsville		126	128				
Briarwood	222		222				
Broadview	526		526				
Chestnilly							
Clear Creek							
Collinswood		224	224				
Cornelius							
Cottage Hill							
Davidson							
Maria Davis	420		490				
Delridge							
Eastgate	276		276				
Gilmore							
Double Oaks	567		587				
Druid Hills	312		312				
Fernover		42	42				
Elizabeth		30	30				
Eden Park		79	79				

	FAILED	S. C. C.	TEST.				
First Ward	573		533				
Hickory Grove	224		225				
Hidden Valley	302		302				
Highland							
Moskins							
Puntersville							
Hunt. Farms	195		195				
Idlewild	163		163				
Irwin Ave.							
Anay James							
Lakeview							
Lansdowne	252		252				
Lincoln Apartments	456		456				
Long Creek							
Matthews							
Merry Oaks	112		112				
Midwood							
Pontyclaire	217		217				
Myers Park Elem.		153	153				
Nations Ford	201		201				
Newell							
Oakdale							
Oakhurst	105		105				
Oaklawn	405		405				
Old Providence	147		147				

	1973	1974	1975		
Farmstead	160		160		
Paw Creek	223		223		
Few Creek Annex	56		56		
Pine Hill					
Pine Knob	346		346		
Elkze Bend					
Geneva	244		244		
Sandefield Farm		164	164		
Salem	155		128		
Starrock Edns.	90	45	135		
Sherman	117		117		
Stewarton	234		234		
Stevensville Rd.					
Steele Creek		119	119		
Thomestown	95	94	189		
Iron Hills	325		325		
Jacksonsnee	150		120		
University Pk.	530		530		
Littlerights	73		73		
Wentzly Hills		140	140		
Hilltop		71	71		
Winter Park	236		236		
Winterfield	192		192		
	10,203	2,222	17,827		

1059a

COUNT ORDERED ITEM
CHARLOTTE-MCDONALD SCHOOLS

1. Cost Buses *	\$ 2,369,064.08
2. Cost of Parking Areas *	284,800.00
3. Cost Operation **	586,613.76
4. Personnel **	166,190.00
5. Total Cost First Year	\$ 3,406,687.84

NOTES:

- * These Capital Outlay items do not reflect annual depreciation.
- ** These items are costs which recur each year. These figures do not take into account anticipated annual cost increases.

1060a

COUNT ON BUDGET PLAN
COSTS FOR REMAINDER 1969-70 YEAR

	COST OPERATION	PERSONNEL	TOTAL
Elementary Schools - 49 days	\$101,230.08	\$ 28,347.48	\$129,577.56
Junior and Senior High Schools 26 Days	30,550.00	8,800.00	39,350.00
TOTALS	\$131,781.12	\$ 37,147.48	\$168,928.60

1061a

COUNT CHARGE IN USE

CHARGED TO CASH IN USES

SUPERIOR HIGH SCHOOL, OHS

1. Capital Outlay

A. 60 Bands @ \$5,387.00 Ea.	\$ 321,747.16
B. Equip. mt	1,750.00
C. Service Vehicles	
Service Trucks - 3	7,500.00
Gasoline Delivery Truck - 1	5,000.00

2. Cost Operation

	Daily	Annual
Drivers' Salaries	\$353.97	\$ 49,098.57
Gasoline, oil, grease, anti-freeze	64.17	11,619.77
Mechanic Salaries	89.01	16,110.81
Repair Parts	16.55	2,997.35
Tires and Tires	-	-
TOTALS	\$529.92	\$ 95,915.52

3. Personnel

A. Supervisory - 1	\$ 8,190.00
B. Clerical - 1	6,120.00

1062a

COURT ORDERED PLAN
CHARLOTTE-MECKLENBURG SCHOOLS
JUNIOR HIGH SCHOOLS

1. Capital Outlay

A. 84 Buses @ \$5,387.64 ea.	\$452,561.76
B. Equipment	2,250.00
C. Service Vehicles	
Service Trucks - 4	10,000.00
Gasoline Trucks - 2	10,000.00

2. Cost Operation

	Daily	Annual
Drivers' Salaries	\$430.92	\$ 77,996.52
Gasoline, oil, grease, anti-freeze	78.12	14,139.72
Mechanic Salaries	108.36	19,613.16
Repair Parts	20.16	3,638.86
Tires and Tubes	-	-
TOTALS	\$605.12	\$116,760.72

3. Personnel

A. Supervisory - 3	\$ 24,570.00
B. Clerical - 1	6,120.00
C. Bus Dispatcher - 1	7,800.00

1063a

COMM. CAMPUS P.

CHAMBERS TRAINING SCHOOLS

ELECTRICAL

1. Capital Outlay

A. 269 Buses @ \$5,367.04 ea.	\$1,449,275.16
B. Equipment	6,500.00
C. Service Vehicles	
Service Trucks - 11	27,500.00
Gasoline Delivery Trucks - 5	25,000.00

2. Cost Operation

	Daily	Annual
Drivers' Salaries	\$1,379.97	\$219,770.57
Gasoline, oil, grease, anti-freeze	250.17	45,200.77
Mechanics' Salaries	397.01	62,803.81
Equipment Parts	64.56	11,605.36
Tires and Tubes	—	—
TOTALS	\$2,055.92	\$373,931.52

3. Personnel

A. Supervisory - 5	\$ 40,950.00
B. Clerical - 3	18,360.00
C. Bus Dispatcher - 1	7,800.00
Assistant Bus Dispatcher - 1	5,200.00
D. Mechanical Supervisor - 2	16,640.00
E. Personnel Manager - 1	8,320.00
F. Driver Training Supervisor - 1	7,800.00
G. Bus Route Specialist - 1	8,320.00

1064a
COURT ORDER PLAN
ADDITIONAL TRANSPORTATION REQUIRED
CHARLOTTE-MECKLENBURG BOARD OF EDUCATION
SENIOR HIGH SCHOOLS

SCHOOL	NO. STUDENTS TO BE TRANSPORTED	NO. BUSES REQUIRED	BUS PARKING AREA	BUS PARK. AREA COST
East Mecklenburg	465	11	S	77
Garinger	471	11	N	7,000
Harding	45	1	S	77
Independence	300	7	S	77
Myers Park	308	7	N	5,600
North Mecklenburg			S	77
Olympic	16	1	S	77
Second Ward				
South Mecklenburg	412	10	D	6,600
West Charlotte	219	5	D	4,600
WestMecklenburg	261	6	D	5,000
<u>Changes in Attend. Areas</u>		10		
	2,497	69		28,603