

**Avalon Tour and Charter**  
**P.O Box 577**  
**Hanover, MD 21076**  
**410-379-0197**

September 17, 2008

Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, D.C. 20001

RE: Metrobus Public Hearing No. 534  
Docket No. B08-3

We reject your proposal to Fare Increases for the following reasons:

The proposal undermines the intent of the FTA Charter Service Rule. The rate change will be used as an argument to do Charter Service work. This causes an unfair advantage in work and competition; Federal Funds vs. No Federal Funds.

There are plenty of carriers to do Charter work in the area. If you are called upon to do Charter work, going through the FTA Waiver is of no cost to you. If you want to compete with Charters, then do so without public funds. You are putting the cart before the horse; FTA has not given the green light for Charter work. Until they do, there should be no rate increase.

We fully understand why it is to your advantage to do Charter work:

1. You will receive perks from local companies and add to ridership numbers to secure more Federal Funds.
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Your adjustments for Charter Rates is just a scam to do Charters and still reserve the right for waivers to discount Charter Rates to who you want to; again, misuse of Federal Funds.

On this note, we reject the Charter increase and you should refrain from doing Charter work. It is a Federal Law.

Sincerely,

A handwritten signature in black ink, appearing to read "William Baker". The signature is written in a cursive style with a large initial "W" and a long, sweeping underline.

William Baker  
President

**September 15, 2008  
Magic Carpet Tours Bus Service Inc.  
200 W. 21<sup>st</sup> Street  
Richmond, Va. 23225**

**This letter is to inform that I am against the proposal change to the  
Metrobus Charter Service Fare Increased on Docket # B08-3.**

**Public Hearing # 534**

**James M. Brown Sr**

**public-hearing-testimony - Public Hearing No 534 - Metrobus Fare Increase for Charter Bus Service**

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**From:** "Brandon Buchanan"  
**To:**  
**Date:** 9/22/2008 5:04 PM  
**Subject:** Public Hearing No 534 - Metrobus Fare Increase for Charter Bus Service  
**Attachments:**

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Please see the attached statement.

The American Bus Association does hereby submit written comments to the notice of a public meeting related to the proposed rate increase for charter bus work provided by vehicles operated by the Washington Metropolitan Area Transit Authority throughout the areas designated in its Compact as service areas.

The American Bus Association is the designated representative of over 1000 motorcoach and tour operators throughout North America, as well as over 2500 travel industry organizations including hotels, restaurants, museums, destination marketing organizations and other destination supporters of motorcoach travel. The ABA in its capacity represents over 50 private Motorcoach and tour operators in the Washington, D.C. metropolitan area.

Although the charter bus rules have been a part of the public record for nearly 40 years, the recent charter bus regulations released by the Federal Transit Administration in the spring of 2008 has reenergized the discussion and prominence of public and private motorcoach transportation.

There are many services offered by motorcoach operators, but much attention is devoted to two service options provided by nearly 100% of all private bus operators: charter bus service and scheduled service/fixed route operations. Charter bus service is provided by nearly 96% of the operators in the private motorcoach industry, whereas an estimated 12% of the 3,500 U.S. motorcoach companies offer fixed route services. The great majority of private motorcoach operators rely on charter bus work to keep their businesses running, regardless of the profile of their operations. While most private operators are small companies of between 5 and 10 fleet vehicles, the private motorcoach industry is one that celebrates collaboration between companies and it is not unusually to see multiple companies contribute to provide passenger transportation services at a large convention or sporting event. It is rare that a coalition of private operators in any given area cannot work together to provide for all the transportation needs requested by a customer. Another example of that spirit of collaboration is provided when fixed route operators work together to transport a passenger across the country on a single ticket, through a process called interlining.

Several aspects of this notice threaten the lifeblood of the private motorcoach industry and specifically violate the charter rules in some instances.

ABA would like to reaffirm that in order for WMATA to provide any kind of charter service, the notification of private operators, or the request for a waiver must completely run its course. By posting this notice, WMATA is providing an opportunity for potential clients to undervalue the services provided by private operators by creating a de facto ceiling for charter bus prices in the Washington, D.C. area. This notice appears to presume that a waiver will in fact be granted, when in fact the waiver is intended to be the exception to the rule.

ABA would like to question why WMATA would provide pricing for lecture services (also known as sightseeing tours in this notice), when sightseeing tours are specifically prohibited by the charter rules.

If the intent of this notice was to provide information to exempted governmental agencies for planning purposes, this notice should have also included the limited instances that governmental and qualified human service providers could utilize charter bus services provided by FTA-funded vehicles. Accordingly, the yearly limitations on allowable services provided to governmental agencies should have also been mentioned.

In addressing the charges for service minimums, the notice should have also described the hours of service (and geographical service limitations) mandated by the FTA and Federal Motor Carrier Safety Administration.

ABA would also question how parochial and day schools would be able to utilize charter bus services provided by WMATA without some specific arrangements for fixed route services, rather than the generalized term school-related functions as school-related functions generally describes charter bus service to off-campus activities, rather than fixed route school bus services or the expansion of existing route services.

We look forward to your response to the concerns of the private motorcoach industry and hope that you will reconsider all of the applications of the charter bus rules before applying this rate increase.

Respectfully submitted,

American Bus Association  
700 13<sup>th</sup> Street, NW, Suite 575  
Washington, DC 20005  
(800) 283-2877  
abainfo@buses.org



**Bus Service, Inc.**

45 Bremer Drive

Glen Burnie, MD 21061

Phone: (410) 766-1108 Fax: (410) 760-9576

Sept. 19, 2008

Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, D.C. 2001

RE: Metro Public Hearing No. 534  
Docket No. B08-3

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On this note, we reject the Charter increase and you should refrain from doing Charter work. It is a Federal Law.

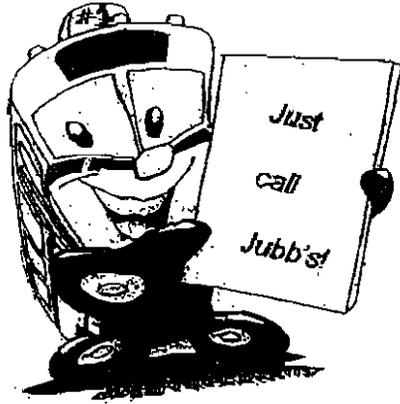
Sincerely,

A handwritten signature in black ink, appearing to read "Carol L. Hubers", written in a cursive style.

Carol L. Hubers

Vice President and

Vice President of Maryland Motor Coach Association



A FAX FROM

***JUBB'S BUS SERVICE***

**CHARTER DEPARTMENT**

203 Holsum Way, Glen Burnie, MD 21060  
PHONE: 410-766-1545 FAX: 410-766-1216

**DATE:** September 22, 2008  
**TO:** OFFICE OF THE SECRETARY  
**FAX NUMBER:** 1202-962-1133  
**FROM:** Carol Joyce  
**NO OF PAGES:** 2, including the cover sheet

**RE:** Undermine intent of FTA Charter Service Rule





## **JUBB'S BUS SERVICE**

203 Holsum Way, Glen Burnie, MD 21060

phone: 410-766-1545 fax: 410-766-1216

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Honorable James S. Simpson, Administrator  
FEDERAL TRANSIT ADMINISTRATION  
1200 New Jersey Avenue, NE  
4<sup>th</sup> - 5<sup>th</sup> Floors - East Building  
Washington, DC 20590

Dear Administrator Simpson:

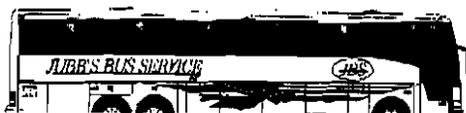
I'm writing to support your current efforts to strengthen the prohibition of using federally subsidized buses in school bus operations.

School transportation operates during peak commuter hours – times when transit buses should be fully utilized by the general public. Buses used for school routes cannot be “express capacity” but must be purchased specifically for transporting students – a clear violation of FTA’s regulations and a misuse of the funds Congress intends for public transportation. Students who are transported to and from school on transit buses rather than school buses lose the important safety protection built into school buses. Transit buses lack the structural integrity, the occupant protection features, and the traffic control devices of school buses. The National Highway Traffic Safety Administration has the responsibility to ensure that our children travel to and from school safely and that agency, along with the National Transportation Safety Board, has said that all children should be transported in vehicles that meet the federal motor vehicles safety standards for school buses. School buses provide a system with drivers trained to protect their passengers, unlike the open environment of transit where children may be exposed to any number of influences. Also, keep in mind, school bus service is more cost efficient than transit. Even though the charge to school districts may be lower because of the federal subsidies to transit agencies, the cost to taxpayers is higher. School bus service operates at about one third the cost of transit service and is about 40% more fuel efficient. Thank you for your time.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Randall E. Jubb".

Randall E. Jubb, President  
JUBB'S BUS SERVICE, INC.



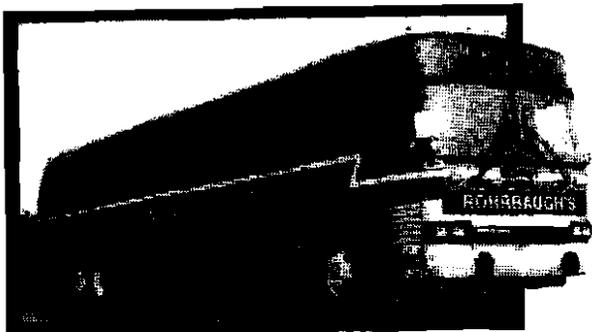
## Bill Rohrbaugh's Charter Service, Inc.

P.O. Box 690, 3395 Main St., Manchester, MD 21102-0690  
 410-239-8000 Balto. - 410-374-9200 Local  
 1-800-543-9090 Nationwide - 410-239-3551 Fax  
 www.rohrbaughs.com

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September 21, 2008



Office of the Secretary  
 Washington Metropolitan Area Transit Authority  
 600 Fifth Street, NW  
 Washington D.C. 20001

RE: Metro Public Hearing No. 534  
 Docket No. B08-3

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On this note, we reject the Charter increase and you should refrain from doing Charter Work. It is a Federal Law.

Very truly yours,

*William L. Rohrbaugh*  
 William L. Rohrbaugh

#### BRANCH OFFICE:

Belair Beltway Plaza  
 7694 Belair Road  
 Baltimore, MD 21236  
 (410) 882-7501 - (410) 661-8044 Fax



Member of  
 Atlantic City Bus Owners Association  
 Maryland Motorcoach Association  
 Pennsylvania Bus Association  
 United Motorcoach Association  
 National Motorcoach Association  
 American Association of Travel Agents, Inc.  
 American Society of Travel Agents



Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street N.W.  
Washington, D.C. 20001

September 19 2008  
Docket # B08-3

Gentlemen:

I am writing representing the private sector Motor Coach Operators of the Maryland Motor Coach Association. We are concerned; distressed might be a better word about the position WMATA has taken with respect to the F.T.A. charter bus ruling. WMATA is asking for rate increases for services they cannot provide. Rates will not change a *subsidized entity* into a private sector carrier. The immediate suggestion of discounting rates in the compact area, which is not as compact as the name implies, is something a *private sector* operator cannot afford to do. Discount is another word for subsidy in a publicly funded company. For the tax payer and private sector businesses to support this initiative is reminiscent of our citizenry picking up the tab for the real estate industry We should not be required to support public companies operating in the private sector.

Simon J. Shea Sr.  
President  
Maryland Motorcoach Association  
8861 Citation Rd.  
Baltimore, Md. 21221  
cc: file F.T.A. matters (really)



# GOLDEN RING TRAVEL

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BALTIMORE, MARYLAND 21221

Sept. 19, 2008

Office of the Secretary  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, D.C. 2001

RE: Metro Public Hearing No. 534  
Docket No. B08-3

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Hours Mon-Sat 9-5  
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8861 Citation Road  
Baltimore, MD 21221

SAM SHEA  
President  
Email: goldenringbus@aol.com

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*Golden Ring Travel & Transportation Inc.  
Sam Shea Sr.  
President*