



June 18, 2015

Mr. Scott Darling
Chief Counsel
Federal Motor Carrier Safety Administration, U. S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Dear Mr. Darling:

On behalf of the American Bus Association (ABA) and the United Motorcoach Association (UMA), we respectfully request an extension of time for filing petitions for reconsideration of the final rule filed under docket FMCSA-2012-0103, "Lease and Interchange of Vehicles: Motor Carriers of Passengers" (Final Rule). This request is made pursuant to guidance from the Federal Motor Carrier Safety Administration's (FMCSA) Office of Chief Counsel, pursuant to 49 CFR Part 389. We request a 60-day extension, extending the current deadline of June 26, 2015 to August 25, 2015.

ABA and UMA jointly represent approximately 1,500 over-the-road motorcoach operators and over 70% of the motorcoaches operating over the road in intrastate and interstate commerce. Our members operate all manner of bus operations, including intercity scheduled service, charter and tour operations, airport shuttles, contracted transit service and employee shuttle services.

In the wake of publication of the Final Rule, our members have raised a number of significant questions regarding the practical and operational applications of the rule's requirements necessary for the successful implementation of the rule.

The diversity of our member's operations, some of which are addressed directly by this rule and some of which are indirectly addressed, we believe, has led to unintended consequences or possibly inaccurate interpretations. Therefore, before we consider filing a petition for reconsideration, we initially would like to work with the Agency and seek clarification.

We are currently in the process of coordinating meetings with FMCSA to provide clarification as well as guidance and assistance; however, we believe this effort will not be completed in sufficient time to allow for a timely filing of a petition for reconsideration, if necessary. Our first meeting to discuss the Final Rule with FMCSA is scheduled for June 18. However, we believe it will require more than one meeting to address the various concerns raised by our members, as well as additional time to consider FMCSA's responses, and interpret and convey the information to our effected members.

Given the compliance date of the Final Rule is relatively distant, January 1, 2017, then a 60-day extension of the period for the filing of petitions for reconsideration is not unreasonable. A 60-day extension would provide our members the opportunity to work with FMCSA to answer questions and clarify requirements of the Final Rule, without risk of missing the deadline for filing a petition for reconsideration, if it is deemed necessary.

We appreciate your expeditious consideration of our request in light of the pending deadline.

Respectfully,

A handwritten signature in blue ink, appearing to read "Ken Presley".

Ken Presley
Vice President of Industry Relations & COO
United Motorcoach Association

A handwritten signature in blue ink, appearing to read "Brandon Buchanan".

Brandon Buchanan
Director of Regulatory Affairs
American Bus Association