



December 1, 2020

Dr. José R. Romero, MD, FAAP
Chairman
Advisory Committee on Immunization Practices
Centers for Disease Control and Prevention
1600 Clifton Rd.
Atlanta, GA 30329-4027

RE: COVID-19 Vaccine Allocation - Docket No. CDC-2020-0121 – Emergency Meeting

Dear Dr. Romero:

On behalf of the American Bus Association (ABA), I submit these comments in response to the Federal Register Notice of Meeting; Request for Comment, posted for pre-publication on December 1, 2020, concerning COVID-19 Vaccine Allocation (the Notice).

As the Advisory Committee on Immunization Practices (ACIP) is charged with advising the Director of the Centers for Disease Control and Prevention (CDC) on the use of immunizing agents, and the ACIP is holding an emergency virtual meeting to include discussion of COVID-19 vaccine allocation, we urge you consider the importance of ensuring professional drivers and support staff involved in operating passenger carrying commercial motorcoaches, remain a priority in terms of vaccine allocation.

The commercial motorcoach industry has played a critical role in responding to not only the COVID-19 pandemic, but also the other various national emergencies caused by hurricanes and wildfires over the past 8 months. These emergency response operations are in addition to the daily, integral role passenger-carrying commercial motor vehicles play in the national transportation network, by connecting rural communities to necessary medical services and urban centers, moving commuters to/from work, and the moving the military along with their equipment to training and deployment assignments. **For these various reasons, the U.S. Department of Homeland Security's Cybersecurity and Infrastructure Security Administration (CISA), designated professional drivers of commercial motorcoaches and their support staff as "essential workers" to enable these operations to continue during the COVID-19 pandemic, and why these workers should be prioritized in terms of COVID-19 vaccine allocation.**

The passenger-carrying commercial motor carrier workforce has been on the front lines during the COVID-19 pandemic, moving health care workers, both civilian and military, along with supplies around the country. These essential workers have put their lives at risk, and taken criticism from the communities in which they live and operate, in order to bring much needed help to COVID-19 "hot spots," and relieve quarantined cruise ship passengers. Further, this industry carried out these duties

despite the loss of nearly 90% of the passenger-carrying commercial motor carrier industry's revenue due to COVID-19 shutting down the economy.

As you well know, the nation is far from recovering from this pandemic and the months ahead may see an unprecedented increase in cases, due to the winter season and rise of infections. Therefore, the passenger-carrying commercial motor carrier industry will remain in high demand to assist with not only moving health care personnel and supplies where needed, but also to assist with the vaccine allocation as well. In other words, our professional drivers and support staff will remain essential and highly exposed workers, who merit priority in terms of COVID-19 vaccinations.

As identified by the National Academies of Science (NAS) in their recently published "Framework for Equitable Allocation of COVID-19 Vaccine" (National Academies of Sciences, Engineering, and Medicine. 2020. *Framework for Equitable Allocation of COVID-19 Vaccine*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25917>) and in the ACIP's own initial recommendations (<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/recommendations-process.html>, posted Nov. 25, 2020), private intercity and charter motorcoach operators should be afforded the same Phase 1b access to COVID-19 vaccines as is currently recommended for airline personnel, Amtrak operators and public transit providers:

"Bus drivers and workers who provide or support intercity, commuter and charter bus service in support of other essential services or functions." (The Essential Critical Infrastructure Workers Guidance Version 2.0, published March 28, 2020, Page 10, <https://www.cisa.gov/publication/guidance-essential-critical-infrastructure-workforce>)

The U.S. commercial motorcoach industry provides nearly 600 million passenger trips per year, on par with the commercial airline industry and far in excess of Amtrak ridership. But to remain viable and continue to serve the nation in this time of crisis, along with being positioned to assist in economic recovery efforts, we must have a robust supply of healthy professional drivers and support staff. Priority access to approved COVID-19 vaccine options for our essential workers is necessary, and a sound policy decision to support the nation's transportation network, so vital for access to medical resources and the economy in general.

Along with you, we have a duty to ensure critical transportation providers, from all modes, remain in a position to assist during this pandemic. We therefore urge you to stand by the CDC/ACIP's initial recommendations, supported also by CISA and NAS, to ensure professional motorcoach drivers and their support staff remain eligible for Phase 1b access to COVID-19 vaccinations, when available. I appreciate this opportunity to submit these comments and look forward to working with the CDC as well as others during the development and implementation of this critical process. We also stand by and at the ready to help participate in the distribution of these critical supplies as mobile distribution points. I may be reached at (202) 218-7229 or ppanutso@buses.org. Our mailing address for any correspondence is 111 K Street, NE, 9th Floor, Washington, DC, 20005.

Sincerely,



Peter J. Pantuso
President & CEO