



Tuesday, May 27, 2025

The Honorable Derek Barrs
Acting Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Dear Acting Administrator Barrs:

On behalf of the American Bus Association (ABA), I would like to extend our congratulations on your appointment as Acting Administrator of the Federal Motor Carrier Safety Administration (FMCSA). We appreciate your long-standing commitment to transportation safety and look forward to working collaboratively with you and your team to strengthen both public safety and the operational viability of the private motorcoach industry.

As a first step, we respectfully request the opportunity to meet with you and your senior leadership team to introduce our association, share industry perspectives, and discuss opportunities for ongoing engagement around key regulatory priorities.

Founded in 1926, the ABA is the leading national trade association representing private motorcoach operators in the United States. Our members provide critical transportation services across intercity, charter, tour, and commuter markets—connecting tens of millions of passengers annually to jobs, healthcare, education, and tourism. As you know, motorcoaches remain among the safest and most environmentally efficient modes of passenger travel, and our member companies—ranging from small family-owned businesses to regional and national operators—are committed to upholding the highest standards of safety and compliance.

In that spirit, we write to share several current priorities and regulatory concerns where we believe a productive partnership with FMCSA can yield meaningful outcomes:

Safety Measurement System (SMS) and CSA Reform

ABA supports efforts to modernize the Compliance, Safety, Accountability (CSA) program, including improvements to the Safety Measurement System. However, we remain concerned that the current methodology continues to conflate motorcoach operations with freight carriers, failing to reflect the distinct safety profile and risk exposure of passenger transportation. We urge FMCSA to ensure any final changes include appropriately segmented peer groupings, revised violation weightings, and a data review process that fairly considers the operating environments of small and seasonal carriers.



Speed Limiter Rulemaking

We understand the safety rationale behind proposed speed limiter regulations but urge FMCSA to evaluate the unique circumstances of motorcoach operations—especially given the already exemplary safety record of the industry. Applying truck-centric standards to passenger carriers may have unintended consequences on trip scheduling and passenger mobility, particularly in rural areas.

Hours of Service and ELD Compliance

Motorcoach operations, including overnight tours and charter services, often involve non-standard schedules. We seek continued engagement with FMCSA to ensure that existing HOS and ELD rules provide appropriate flexibility for passenger service and reflect the differences between tour-based and freight logistics. Additionally, consistent guidance and enforcement approaches across FMCSA regional offices remain a priority.

Entry-Level Driver Training (ELDT)

ABA supports the national ELDT framework but is concerned about implementation challenges, including state-level inconsistencies and barriers for small operators to become certified providers. We welcome FMCSA's collaboration in reducing administrative burdens, ensuring effective oversight of the Training Provider Registry, and supporting recruitment into the motorcoach driver workforce.

Drug and Alcohol Clearinghouse Oversight

Our members are committed to maintaining a drug-free workplace, and we appreciate FMCSA's leadership in advancing the Drug and Alcohol Clearinghouse. At the same time, we continue to seek clarity on reporting responsibilities, recordkeeping for seasonal or part-time drivers, and the treatment of returned-to-duty drivers under the system.

Motorcoach Technology and Automation

As FMCSA explores policy frameworks for automation and advanced driver assistance systems, ABA urges the agency to proactively include motorcoach stakeholders in its outreach and planning. The unique passenger safety and operational implications of AV technology warrant dedicated engagement and research.

We welcome the opportunity to meet with you and your leadership team at your earliest convenience to further discuss these issues. ABA remains committed to fostering a constructive dialogue with FMCSA and providing actionable, industry-informed insights to support safe and effective regulatory outcomes.



We welcome the opportunity to meet with you and your leadership team at your earliest convenience to further discuss these issues. ABA remains committed to fostering a productive and transparent partnership with FMCSA. Together, we can modernize oversight in ways that both elevate safety and support the long-term viability of the private motorcoach industry.

CDL English Language Proficiency Requirement

ABA supports the safety intent behind FMCSA's English language proficiency standard but is increasingly concerned about the lack of implementation consistency and clear guidance across states. Motorcoach operators across the country report significant confusion and delays in the licensing process, particularly for non-native English speakers who are otherwise fully qualified drivers. We encourage FMCSA to issue updated guidance or initiate a stakeholder dialogue to ensure that enforcement of this standard balances safety with workforce accessibility—especially in light of persistent CDL driver shortages impacting the passenger sector.

We would greatly appreciate the opportunity to meet with you and members of your leadership team in the near future to further discuss these issues and explore collaborative solutions. ABA remains committed to fostering a productive and transparent partnership with FMCSA. Together, we can modernize oversight in ways that both elevate safety and support the long-term viability of the private motorcoach industry.

This is a pivotal moment for passenger surface transportation. As FMCSA advances its regulatory agenda, we stand ready to provide the insights, expertise, and collaboration necessary to ensure that policies are practical, equitable, and grounded in real-world operations. We look forward to building a strong working relationship with you and achieving shared goals on behalf of the traveling public.

Thank you for your attention and leadership.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Ferguson".

Fred Ferguson
President and CEO
American Bus Association