



May 14, 2025

RE: Opposition to Section 232 Tariffs on Medium- and Heavy-Duty Truck Parts

Dear Secretary Lutnick:

On behalf of the American Bus Association (ABA) and the United Motorcoach Association (UMA), we are writing out of concern regarding the imposition of additional tariffs on medium- and heavy-duty truck parts under the Department's Section 232 investigation, initiated on April 22, 2025. Collectively, our organizations represent the U.S. motorcoach¹ industry, which includes original equipment manufacturers, parts suppliers and thousands of small and family-owned passenger transportation providers employing more than 76,000 Americans.

While the scope of the investigation primarily targets the trucking sector, approximately 50 percent of parts are interchangeable with components used in the intercity and charter bus industry. Imposing tariffs on these parts would have a profound and unintended impact on the cost structure and safety of bus operations across the country.

Motorcoach travel plays a vital role in national mobility, offering safe, efficient, and environmentally sustainable transportation to millions of Americans each year—including students, seniors, military personnel, commuters, emergency evacuees, and travelers in underserved and rural communities. An increase in parts costs due to new tariffs would:

- **Raise operating costs** for bus operators, most of whom are small businesses already facing tight margins.
- **Suppress safety innovation and maintenance**, as the price of replacement components and advanced safety systems would climb.
- **Reduce service availability** and affordability for the traveling public, especially in areas with limited transportation alternatives.

¹ According to section 32702 of the Motorcoach Enhanced Safety Act of 2012, the term "motorcoach" has the same meaning as "over-the-road bus" as defined in section 3038(a)(3) of the Transportation Equity Act for the 21st Century (TEA-21).

The United States does not produce traditional motorcoaches². U.S. firms strategically left the market in the 1980s, while the Canadian and European manufactures, some of whom have been operating for over 100 years, absorbed the capacity and market share. It is noteworthy that a substantial share of parts and maintenance services are supported by American workers and businesses, including transmissions and engines. Additional tariffs will disrupt this ecosystem and jeopardize jobs throughout the parts supply chain, vehicle servicing network, and broader tourism and group travel industries – adversely affecting the U.S. employee base.

We respectfully request the Department consider the unique position of the motorcoach industry as a collateral stakeholder in this proceeding and take the following actions:

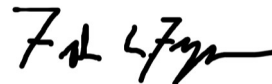
1. Exclude from any final action all motorcoach-relevant parts and
2. Recognize that there is significant overlap in parts for trucks – the stated target of this investigation – and motorcoaches, and avoid imposing any new tariffs on imported parts that would raise costs or restrict access to critical safety and operational components for the U.S. motorcoach sector.

We welcome the opportunity to further engage with the Department as this investigation continues. Please consider us a resource and a partner in ensuring that national security and economic vitality are not advanced at the expense of small businesses and safe passenger mobility.

Sincerely,



Scott Michael
President & CEO
United Motorcoach Association



Fred Ferguson
President & CEO
American Bus Association

² Traditional motorcoaches are considered elevated passenger deck over baggage using monocoque construction.