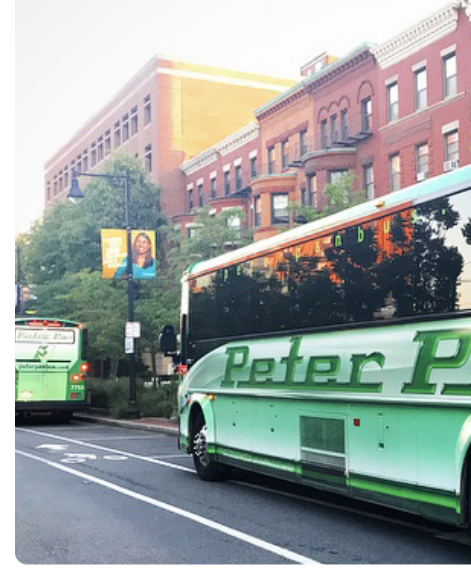


Restoring Common Sense on Motorcoach Idling

Unnecessarily restrictive idling limits can create significant operational, economic, and environmental consequences for motorcoach operators and the communities they serve. Modern motorcoaches rely on engine-powered systems to conduct federally required safety inspections, operate ADA accessibility equipment, maintain passenger comfort and ventilation, support emissions-control systems, and ensure reliable service.

At the same time, motorcoaches are the most environmentally efficient form of passenger transportation in the United States, reducing both traffic congestion and overall transportation emissions by moving dozens of travelers in a single vehicle. Policies that penalize routine operational idling risk discouraging the use of motorcoaches and shifting passengers to less efficient transportation options, increasing roadway congestion, fuel consumption, and emissions.



WHY BUSES MUST IDLE

- FMCSA required pre-trip safety inspections
- Air brake pressure systems
- ADA lifts and accessibility systems
- HVAC and ventilation in sealed cabins
- Door controls and kneeling systems
- Windshield defogging and visibility
- Emissions system regeneration



\$120K

Fines issued to one operator in a single day under NYC's bounty program



200

Citations issued to a single operator in one day



3 Min

NYC idling limit – insufficient for FMCSA pre-trip safety inspections

The Problem

- NYC's bounty-style enforcement program rewards private citizens for reporting idling buses, dramatically increasing citations against motorcoach operators.
- Interstate carriers can receive massive penalties under this system, including one operator receiving 200 citations totaling \$120,000 in a single day.
- Local idling violations may also expose operators to potential Clean Air Act citizen-suit litigation, creating substantial legal costs and liability risks for routine operational activities that often have limited environmental impact.
- Enforcement disproportionately targets private motorcoaches while public transit buses are exempt from the same enforcement framework, raising concerns about fairness and regulatory parity.
- Three-minute idling limits are often insufficient to conduct FMCSA-required pre-trip safety inspections or safely heat and cool motorcoaches before passenger boarding, creating conflicts between operational realities and regulatory compliance.
- Rising fines, legal costs, and compliance burdens threaten small operators, increase costs for passengers and tourism, and undermine the use of one of the nation's cleanest and most congestion-reducing transportation modes.
- NYC's enforcement model risks becoming a blueprint for other cities, multiplying fines, lawsuits, and jeopardized safety across the interstate motorcoach network.

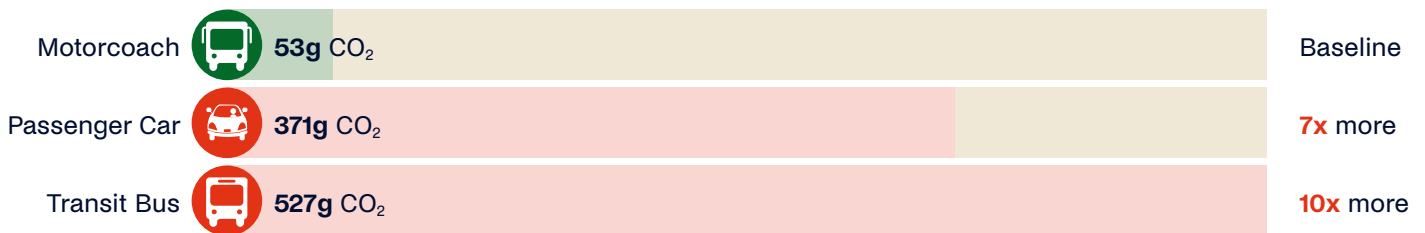


**American
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100 Years

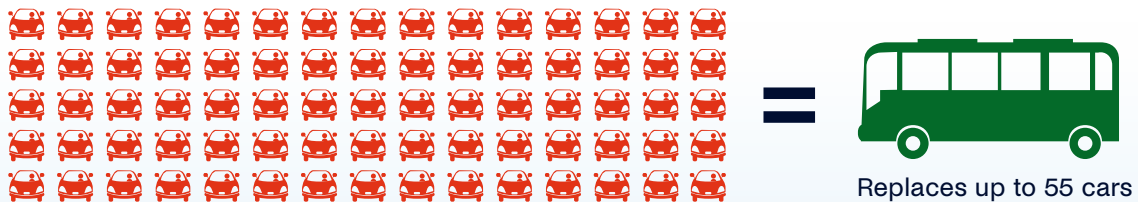


Motorcoaches are a Clean Transportation and Congestion Solution

Motorcoaches are the lowest-emission form of passenger transportation in the U.S., producing just 53 grams of CO₂ per passenger-mile, about 7x cleaner than passenger cars and 10x cleaner than transit buses, and operators have invested heavily in cleaner engines, anti-idling policies, and sustainability plan.



A single full motorcoach can remove up to 55 passenger cars from the roadway, reducing traffic congestion, fuel consumption, parking demand, and transportation emissions.



Congress Can Restore Balance

- Adopt a national 15-minute idling standard for commercial passenger vehicles consistent with EPA guidance.
- End bounty-based enforcement programs that encourage excessive citations and penalties.
- Exempt motorcoach idling violations from Clean Air Act citizen-suit litigation.
- Prevent local idling rules from conflicting with federal safety, accessibility, labor, and interstate commerce requirements.
- Protect the environmental and congestion-reduction benefits of motorcoach transportation.