



**American
Bus Association™**



June 3, 2026

Chief Counsel & Ombudsman for Charter Services
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Complaint #2026-03 - AC Coach Operations, Inc. v. Pittsburgh Regional Transit

Dear Chief Counsel & Ombudsman for Charter Service:

The American Bus Association (ABA) and the United Motorcoach Association (UMA) submit this correspondence in support of the pending complaint filed by AC Coach Operations, Inc. concerning transportation operations associated with the 2026 NFL Draft in Pittsburgh, Pennsylvania.

ABA and UMA are both national trade associations representing the motorcoach industry, including numerous private charter operators that participate in the Federal Transit Administration's charter registration process under 49 CFR Part 604.

ABA and UMA are not submitting this correspondence as a complainant, but rather as supporting industry organizations with an interest in the consistent and transparent application of the Charter Service Rule and the associated notice and exception framework established under Part 604.

According to research conducted by the American Bus Association Foundation (ABAF), the private motorcoach industry supports more than 75,000 jobs nationwide and plays a critical role in transporting passengers to major sporting events, conventions, tourism destinations, and community activities throughout the country. The transparency and consistent application of the Part 604 notice and exception framework are important to ensure that private operators are afforded the opportunity to participate in

transportation markets that Congress intended to protect through the Charter Service Rule.

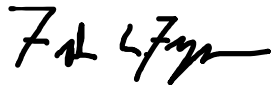
Based on publicly available information and outreach conducted within the industry following the event, both ABA and UMA understand that special “Football Flyer” services were operated by Pittsburgh Regional Transit (PRT) specifically in connection with the NFL Draft, and that multiple private charter operators believe they were impacted by these operations. Both associations further understand that concerns have been raised regarding whether the applicable notice and exception procedures under Part 604 were utilized prior to the operation of this service.

ABA and UMA recognize that transit agencies may adjust or augment existing public transportation service to address anticipated demand associated with major events. At the same time, the charter service framework established by Congress and implemented through Part 604 is intended to preserve clear boundaries between regular public transit operations and transportation services that may otherwise fall within the private charter marketplace. The transparency and predictability of the notice process are important components of that framework.

Accordingly, ABA and UMA support FTA’s careful review of the facts and circumstances surrounding the operations at issue in Complaint #2026-03, including any applicable notice, exemption, or exception provisions under Part 604.

Thank you for your consideration of this matter.

Sincerely,



Fred Ferguson
President & CEO
American Bus Association



Scott Michael
President & CEO
United Motorcoach Association