



American Bus Association

June 5, 2026

U.S. Customs and Border Protection
Department of Homeland Security
Office of Management and Budget Review

Re: Comments on Agency Information Collection Activities, Revision, Customs Declaration, CBP Form 6059B, OMB Control No. 1651-0009, Mobile Passport Control Expansion to Land Ports of Entry and Commercial Bus Environment

To Whom It May Concern:

The American Bus Association (ABA) appreciates the opportunity to submit comments to U.S. Customs and Border Protection (CBP) regarding the proposed revisions to the Customs Declaration information collection and the planned expansion of Mobile Passport Control (MPC) to land ports of entry, including the commercial bus environment.

ABA represents the private bus and group travel industry. Our members move students, seniors, tourists, workers, military groups, cruise passengers, airport travelers, sports teams, and other groups safely and efficiently across the United States and across international borders. Many ABA members operate cross-border service between the United States and Canada or Mexico, and they have a direct operational interest in any CBP program that affects passenger processing, carrier responsibilities, border wait times, manifests, and customer experience.

ABA strongly supports CBP's goal of improving the border crossing process through secure, efficient, and modernized technology. Motorcoach operators have a clear interest in reducing border delays, improving predictability, and helping CBP receive accurate information in advance when possible. A well-designed MPC process could help improve passenger flow, reduce administrative work at the point of inspection, and give CBP better visibility into arriving groups and conveyances.

At the same time, ABA urges CBP to recognize that commercial bus operations differ significantly from air travel, personal vehicle travel, and other passenger environments. Many motorcoach operators do not control passenger ticketing, group booking, or final manifests in the same way an airline may. The commercial bus sector includes scheduled service, charter service, tour service, school and student groups, cruise and airport transfers, sports teams, senior tours, casino trips, and other group movements. In many cases, the bus company is not the seller of the trip, does not have a direct relationship with every passenger, and may not receive final passenger information until shortly before departure.

To help inform these comments, ABA surveyed member companies about the CBP proposal from companies operating across the Northeast U.S./Canada border, Great Lakes/Midwest U.S./Canada border, Pacific Northwest U.S./Canada border, and Southern U.S./Mexico border. Respondents included small, mid-sized, and large operators. The largest share of respondents operates charter and tour services across the border, with additional respondents operating scheduled service, school and student group transportation, and cruise or airport transfers.

The survey results show that operators see potential value in the proposal but also have significant operational concerns that CBP should address before implementation. Among respondents who answered the question on overall operational impact, approximately 39 percent said the proposal would significantly or somewhat improve operations, while approximately 26 percent said it would significantly or somewhat worsen operations, and approximately 22 percent were unsure. This mixed response reflects the industry's view that the proposal could be helpful if implemented properly, but could also add burden, confusion, and delays if it is not tailored to the realities of bus operations.

ABA respectfully offers the following recommendations.

First, CBP should ensure that the MPC process remains flexible and does not become a rigid requirement that prevents a bus from being processed if some passengers do not complete the app submission in advance. ABA members repeatedly emphasized that passenger completion will vary based on age, technology access, language ability, group type, connectivity, and last-minute travel changes. Only a minority of survey respondents indicated that it would be "very realistic" for passengers to complete MPC submissions before arriving at the border. A larger share indicated that it would be "not very realistic" or "not realistic at all."

This feedback is especially important for senior tours, student groups, international tour groups, cruise passengers, and charter trips booked by a third-party group leader. Some passengers may not own a smartphone, may not be comfortable downloading government applications, may have limited English proficiency, may not have reliable connectivity while traveling, or may be unwilling to provide information through an app before fully understanding the process. For those reasons, CBP should preserve multiple acceptable processing pathways, including passenger-submitted MPC, carrier-assisted submission, existing oral or written declaration processes where appropriate, and other fallback procedures. The program should be designed to improve processing when passengers and carriers can use it, not penalize an entire bus when some passengers cannot.

This is especially important because one passenger issue can affect the entire coach. Unlike air travel, a motorcoach operator generally cannot simply leave one passenger behind at a gate without creating significant customer service, logistical, safety, and potential liability concerns. If one traveler has a documentation issue or cannot complete the MPC process, the result may be that 40 to 60 passengers sit for an extended period, drivers approach hours-of-service limits, schools or tour groups miss scheduled activities, and operators absorb additional costs. CBP should ensure that the MPC process helps identify and resolve these issues earlier without creating a system where one incomplete or incorrect submission prevents the rest of the bus from being processed efficiently.

This concern is particularly important for cruise transfers, school groups, student groups, and trips involving minors. Cruise passengers may move from a vessel to a motorcoach on tight timelines and may have limited direct advance communication with the bus operator. Children and student passengers may not have their own smartphones or may depend on a parent, guardian, teacher, tour leader, or chaperone to assist with travel documentation. CBP should ensure the MPC process includes a clear method for group leaders, guardians, or carriers to assist these passengers without delaying the full bus or creating unrealistic compliance expectations.

Second, CBP should clearly define carrier responsibilities and confirm that carriers' obligations are limited to reasonable operational support, such as creating the trip shell, sharing passenger instructions, assisting passengers where feasible, and transmitting information reasonably available to the carrier. Individual travelers should remain responsible for the accuracy of their own customs, immigration, and declaration information. Bus operators cannot verify every passenger's personal declaration, belongings, immigration eligibility, or customs compliance. Operators also may not know what a passenger is carrying in luggage or whether information entered by the passenger is complete and accurate.

CBP should make clear that the carrier's role is operational and facilitative, not a substitute for individual traveler compliance. CBP should also provide clear written guidance on who is responsible for creating the MPC shell, how a passenger joins that shell, what information the carrier may view, what information the carrier must enter for passengers who do not self-submit, and how corrections or late additions are handled.

Third, CBP should provide a carrier-facing dashboard or integration pathway that allows operators to manage bus trips without manually entering large amounts of duplicative information. In ABA's survey, the most commonly identified operational impact was "more time spent managing manifests/passenger information," selected by approximately two-thirds of respondents. Nearly half of respondents also selected "additional staff responsibilities" and "additional passenger support/customer service." More than one-third selected "longer pre-departure preparation."

Based on ABA's survey responses, the practical implementation burden for commercial bus operators may be greater than the per-response estimate suggests, particularly if carriers are expected to create shells, monitor passenger completion, assist passengers, enter information for non-users, update manifests, and answer customer questions. CBP should provide tools that reduce this burden, including:

1. A carrier portal that allows a company to create a trip shell using the bus license plate, date, estimated time of arrival, and port of entry.
2. A QR code or link that can be sent to passengers or group leaders, so passengers can join the correct trip shell.
3. A real-time completion status function that lets the carrier know which passengers have completed the submission, without requiring the carrier to see sensitive information beyond what is necessary.

4. The ability to add, remove, or correct passenger information up to a reasonable point before arrival.
5. Bulk upload, API, or back-office integration options for companies that already collect passenger information through reservation, ticketing, charter, tour, or manifest systems.
6. A manual backup process for small operators, companies with limited administrative staff, and one-time or infrequent cross-border trips.

Without these tools, the proposal could create a significant new administrative burden, especially for small businesses, charter operators, and companies that do not have airline-style reservation systems.

Fourth, CBP should allow carriers to select the port of entry directly when creating a bus trip shell. The Federal Register notice states that MPC uses the device's location services to calculate proximity and determine the correct port of entry. That approach may work for some personal vehicle or pedestrian uses, but it may not work well for bus operations. Bus trips are planned in advance, and passengers may be asked to complete submissions before boarding, at a hotel, at a tour origin point, at a cruise terminal, or while en route. In those circumstances, a passenger's phone may not be near the port of entry when the submission is completed.

For the commercial bus environment, the carrier should be able to identify the intended port of entry, direction of travel, date, approximate arrival time, and license plate when creating the shell. Passengers should then be linked to that carrier-created shell, not required to rely on their own device location to identify the correct border crossing. CBP should also provide a process for updating the port or arrival time if traffic, weather, dispatching, or operational changes require rerouting.

CBP should also account for last-minute equipment substitutions. In commercial bus operations, the specific bus assigned to a trip may change shortly before departure or while en route due to maintenance issues, driver scheduling, fleet availability, weather, mechanical concerns, or other operational needs. Because the proposal relies on the bus license plate to link passengers to the arriving conveyance, carriers need a simple, real-time process to update the license plate associated with an MPC shell without requiring passengers to resubmit information or causing the bus to lose the benefit of advance processing.

Fifth, CBP should pair the technology with operational improvements at the ports of entry. ABA members emphasized that many delays are caused by staffing shortages, traffic volume, inconsistent procedures across crossings, limited bus processing capacity, lack of dedicated lanes, shift changes, document issues, passenger inspections, and officers not being prepared for a large group arrival. While MPC may reduce some administrative steps, it will not fully solve these issues unless CBP also addresses port-level operations.

As part of implementation, CBP should consider whether high-volume bus ports would benefit from dedicated bus processing lanes, appointment windows, group processing procedures, or clear standard operating procedures for commercial buses. At some ports, operators noted that even when passenger information is prepared in advance, delays can still occur because the physical infrastructure or staffing model is not designed to handle a full motorcoach arriving

with 40 to 60 passengers at once. CBP should ensure that ports receiving MPC bus submissions are trained and prepared to use the information efficiently when the bus arrives.

Sixth, CBP should ensure consistency across ports. Operators reported that border crossing experiences can vary significantly by port, shift, staffing level, and local procedures. A technology program will only be useful if carriers and passengers can understand what is expected and rely on a predictable process. CBP should issue national guidance for the commercial bus environment, while allowing for port-specific instructions where necessary. Any port-specific requirements should be clearly published and communicated to carriers in advance.

Seventh, CBP should provide extensive outreach, training, and plain-language instructions before implementation. ABA members repeatedly emphasized the need for clear communication. Operators will need to understand the mechanics of the MPC shell, passenger submission process, license plate linkage, timing requirements, correction process, fallback procedures, and any differences among ports. Passengers and group leaders will need simple instructions that can be shared in advance.

CBP should provide training materials for carriers, including sample passenger instructions, group leader instructions, frequently asked questions, troubleshooting guidance, and multilingual materials. CBP should also consider conducting webinars or listening sessions with the motorcoach industry before implementation. ABA would welcome the opportunity to help CBP communicate with operators and gather additional feedback.

Eighth, CBP should protect passenger privacy and limit carrier access to sensitive information. If carriers are asked to help manage the MPC process, CBP should define what information a carrier may access, what information it must retain, and what information it should not retain. Many bus companies are small businesses and do not have the same data infrastructure as airlines. The program should be designed so carriers can verify operational completion without unnecessarily handling sensitive personally identifiable information.

Ninth, CBP should pilot the program before broad implementation. ABA recommends that CBP begin with a voluntary pilot at selected high-volume bus ports of entry and with a diverse set of operators, including scheduled-service carriers, charter operators, tour operators, and small businesses. CBP should avoid making participation mandatory until the program has been tested across different service models, ports, and operator sizes. A pilot should measure whether MPC actually reduces total processing time, reduces officer administrative burden, improves passenger experience, and avoids creating unreasonable costs or responsibilities for carriers.

The pilot should track practical metrics, including:

1. Passenger completion rates before arrival.
2. Time required for carriers to create and manage trip shells.
3. Number of passengers requiring carrier assistance.
4. Frequency of late additions, changes, or corrections.
5. Border processing time compared to non-MPC buses.
6. Port staffing and lane availability.

7. Driver and passenger experience.
8. Whether incomplete passenger submissions delay the entire bus.
9. Technical issues related to connectivity, app functionality, language access, and port selection.

The results of the pilot should be shared with industry stakeholders before CBP expands the program broadly or makes any portion of it mandatory.

Finally, many ABA members expressed support for the general concept of pre-submitting information if it meaningfully reduces wait times and improves predictability. Operators want to help CBP move passengers safely and efficiently across the border. A modernized process could be particularly useful if it allows CBP to receive information earlier, identify potential issues before the bus reaches primary inspection, and process large groups more efficiently upon arrival.

However, the program will only work if it is built around the realities of bus operations. Commercial buses often carry large groups of passengers who travel together, but whose information, technology access, language ability, and compliance readiness may vary. One passenger issue can delay an entire bus. Many charter operators do not control the passenger list until close to departure. Many companies operate infrequent cross-border trips and cannot absorb a complex administrative process. Many passengers will still require help. And many border delays are driven by staffing, traffic, infrastructure, and inconsistent local procedures rather than the declaration form alone.

ABA therefore urges CBP to proceed with the MPC expansion in a way that is flexible, pilot-tested, operationally realistic, and clearly communicated. The program should provide carriers with usable tools, protect passenger privacy, clarify the limits of carrier responsibility, preserve backup processing options, and pair technology with adequate port-level staffing and bus processing procedures.

ABA appreciates CBP's efforts to modernize passenger processing and welcomes continued engagement with the agency. We would be pleased to work with CBP to identify operators for pilot participation, gather additional feedback from the industry, and help ensure that the final program supports security, efficiency, and practical implementation in the commercial bus environment.

Sincerely,

A handwritten signature in black ink, appearing to read "Callie Hoyt". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Callie Hoyt
Senior Vice President of Public Affairs and Government Relations
American Bus Association