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June 16, 2011

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JUN 16 2011

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

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Public Record

Re: Petition of Coach USA, Inc. and Megabus Northeast, LLC for Show Cause Order with Respect to Unauthorized Pooling, STB Docket Nos. MC-F-20904, MC-F-20908, MC-F-20912

Expedited Action Requested

Dear Ms. Brown:

On March 22, 2011, Coach USA, Inc. and Megabus Northeast, LLC, (jointly, "Megabus") petitioned the Board to issue an order requiring Greyhound Lines, Inc. ("Greyhound") and Peter Pan Bus Lines, Inc. ("Peter Pan") to show cause why they should not be required to terminate any pooled service they commence through their BoltBus joint venture between Newark, NJ and Washington, DC, a route not covered by any Board-approved pooling agreement. That Petition remains pending. It has come to Megabus's attention that Greyhound and Peter Pan have recently announced what appears to be new pooled BoltBus service between Newark and Philadelphia, PA and between Newark and Boston, MA,¹ which are also routes not

¹ See Exhibit 1, PR Newswire, *BoltBus Expands its Newark, N.J. Hub With Service to Boston and Philadelphia Beginning June 23* (announcing the establishment of BoltBus service between Boston and Philadelphia as well as service between Newark and Boston and Newark and Philadelphia), <http://www.prnewswire.com/news-releases/bolthus-expands-its-newark-nj-hub-with-service-to-boston-and-philadelphia-beginning-june-23-123803979.html>. In a separate submission to the Board, Megabus is today bringing the Board's attention to the fact that Greyhound and Peter Pan are proposing to operate Philadelphia-Boston service through BoltBus, which would constitute an apparent violation of 49 U.S.C. §14302 to the extent that they intend (as seems likely) to engage in pooling on that route.

covered by any Board-approved pooling agreements. BoltBus intends to begin operating over these routes on June 23, 2011.

No existing Greyhound-Peter Pan pooling agreement approved by the Board allows pooled service originating or terminating in Newark. Thus, for the same reasons that Megabus identified in its prior request for a Show Cause Order, Greyhound and Peter Pan should be precluded from offering pooled service that begins or ends in Newark until they obtain required approval of a pooling agreement covering Newark routes under 49 U.S.C. § 14302. If Greyhound and Peter Pan maintain that the proposed new Newark service is not pooled service, they should be required to explain why it is not, unlike all other services offered by them jointly through BoltBus to date.

Greyhound and Peter Pan argued in their March 28, 2011 Opposition of to Megabus's Petition for Show Cause Order that the Board has approved pooled service between Newark and Washington, DC because Newark was listed as an intermediate point in the approved New York-Washington, DC pooling agreement. However, as explained by Megabus in its March 22, 2011 Petition and its March 30, 2011 Reply to Opposition of Greyhound and Peter Pan to the Petition of Megabus, the STB-approved New York-Washington pooling agreement only provided for pooled service to or from Newark where Newark is an intermediate point on a route between New York and Washington and not where service originates or terminates in Newark. Similarly, although Newark is listed as an intermediate point in the 1997 New York-Philadelphia pooling application filed by Greyhound and Peter Pan,² approval of the New York-Philadelphia agreement only authorized service to or from Newark where Newark is served as an intermediate point on a New York-Philadelphia route. Thus, there is no authority for BoltBus to operate service to or from Philadelphia when that service originates or terminates in Newark, as BoltBus now apparently intends to do.

As noted above, Greyhound and Peter Pan also intend to begin what appears to be pooled BoltBus service on a Newark-Boston route. However, none of the Board-approved pooling agreements provide for service between Newark and Boston where Newark serves as a point of origination or termination. Further, there is no Board-approved pooling agreement under which Newark is listed as an intermediate point between Boston and some other point.

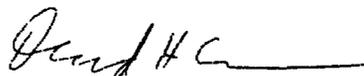
² *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc., Verified Statement of Gregory Alexander*, STB Docket No. MC-F-20904 (Jan. 24, 1997) at Attachments 3 and 4.

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For the above reasons, Megabus respectfully requests that the Board (1) grant Megabus's March 22, 2011 Petition for Show Cause Order and (2) expand the scope of the requested order to include the new proposed Newark-Philadelphia and Newark-Boston routes. Further, Megabus urges the Board to act promptly because the new Newark service is due to be launched on June 23, 2011.

Respectfully submitted,



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cc: Daniel Barney, Counsel for Greyhound Lines, Inc.
Jeremy Kahn, Counsel for Peter Pan Bus Lines, Inc.
Director of Operations, Antitrust Division, U.S. Department
of Justice

EXHIBIT 1



 PRINT THIS

BoltBus Expands its Newark, N.J. Hub With Service to Boston and Philadelphia Beginning June 23

All Seats on New Routes Just \$1 for Travel June 23 -26

SECAUCUS, N.J., June 14, 2011 /PRNewswire/ -- BoltBus, a premium bus line focused on providing exceptional service, luxury and convenience at an amazingly low price, today announced it is expanding its Newark, N.J. service to include Boston and Philadelphia. The company also is launching service between Philadelphia and Boston. The new service launches June 23, with tickets on sale now at www.boltbus.com. To celebrate the launch, all seats on these routes are priced at only \$1 for travel June 23 through June 26. The new service from Newark adds to the already popular runs to Baltimore and Washington, D.C., which launched in March.

"BoltBus continues to demonstrate its strength in the Northeast market, with nearly every schedule selling out due to the ever-growing customer demand," said David Hall, general manager of BoltBus. "Just two months after we launched our Newark hub, we already are expanding the BoltBus experience, which is unmatched in value, service, luxury and safety."

The new service includes four daily, round-trips each between Newark and Boston, and Philadelphia and Boston, and six daily round-trips between Newark and Philadelphia. Customers can board street-side in Newark outside the Greyhound terminal, which is adjacent to Newark Pennsylvania Station. In Boston, the service operates from South Station, and in Philadelphia, BoltBus operates from the corner of John F. Kennedy Blvd. and N. 30th St.

With BoltBus, customers enjoy a higher level of service with on-board amenities such as comfortable seats, extra leg room, free Wi-Fi and power outlets. A loyalty program, Bolt Rewards, is also available to reward frequent riders with free travel. And customers can feel good about their contribution to a better environment by riding BoltBus. The company is a greener transportation alternative, only operating new low-emission coaches that can take up to 50 cars off the road.

Tickets for travel from this new location and all of BoltBus' schedules are currently available for purchase in advance online. Tickets can also be purchased from a driver before boarding, over the phone at 1-877-BOLTBUS or via BoltBus Mobile. Walk-up tickets can be purchased at full price. All tickets are nonrefundable. For additional fare and schedule information, visit www.boltbus.com.

About BoltBus

BoltBus provides fast, frequent and safe transportation with unmatched amenities for an amazingly low price. BoltBus is a division of Greyhound Lines, Inc., operated in affiliation with Peter Pan Bus Lines. The division is headquartered in Secaucus, N.J. For fare and schedule information and to buy tickets, visit www.boltbus.com. For the latest news and travel deals, follow BoltBus on Twitter at <http://twitter.com/BoltBus> and Like us on Facebook at <http://www.facebook.com/BoltBus>.

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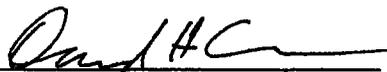
CERTIFICATE OF SERVICE

I hereby certify that I have this 16th day of June 2011 served a copy of the foregoing letter by Federal Express on counsel for Greyhound Lines, Inc. and Peter Pan Bus Lines, Inc. as follows:

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