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March 31, 2011

BY ELECTRONIC FILING

Ms. Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W., Room 1034  
Washington, DC 20423-0001

Re: Opposition of Greyhound Lines, Inc. and Peter Pan Bus Lines, Inc. to Coach USA, Inc. and Megabus Northeast, LLC's Motion to File Reply, STB Docket Nos. MC-F-20904, MC-F-20908, and MC-F-20912

Dear Ms. Brown:

I am enclosing, for filing, a copy of the Opposition of Greyhound Lines, Inc. and Peter Pan Bus Lines, Inc. to Coach USA, Inc. and Megabus Northeast, LLC's Motion to File Reply in the above-referenced proceedings.

Respectfully submitted,



Daniel R. Barney  
Counsel for Greyhound Lines, Inc.

Enclosure

cc: David H. Coburn, Esq., Counsel for Coach USA Inc. and Megabus Northeast, LLC  
(with encl., by email to [dcoburn@steptoe.com](mailto:dcoburn@steptoe.com) and by First Class Mail)

Director of Operations, Antitrust Division, U.S. Department of Justice (with encl., by First Class Mail)

Jeremy Kahn, Esq., Counsel for Peter Pan Bus Lines, Inc. (with encl., by email to [jkahn@erols.com](mailto:jkahn@erols.com))

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**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

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**STB Docket Nos. MC-F-20904, MC-F-20908, and MC-F-20912**

**PETER PAN BUS LINES, INC. – POOLING – GREYHOUND LINES, INC.**

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**OPPOSITION OF GREYHOUND LINES, INC. AND PETER  
PAN BUS LINES, INC. TO COACH USA, INC. AND  
MEGABUS NORTHEAST, LLC'S MOTION TO FILE REPLY**

Greyhound Lines, Inc. (“Greyhound”), and Peter Pan Bus Lines, Inc. (“Peter Pan”) respectfully submit this joint Opposition to the Motion to File a Reply submitted by Coach USA, Inc. and Megabus Northeast, LLC (together, “Megabus”) on March 30, 2011.

**I. ARGUMENT**

In the Motion, Megabus seeks leave to file an eight-page reply (the “Reply”), including over 50 pages of exhibits, responding to the March 28, 2011 Opposition [Reply] of Greyhound and Peter Pan to the Petition For a Show Cause Order With Respect to Unauthorized Pooling, filed on March 22, 2011. While Megabus claims (Motion at 2) that its Reply is intended to offer “a fuller elucidation of the issues” in light of Greyhound’s and Peter Pan’s Opposition, the Reply – which, like its original Petition, lacks any Verified Statement in support – essentially repeats the arguments it advanced in the Petition.

A desire to repeat does not constitute the “good cause” required in order to overcome the Board’s rule that “[a] reply to a reply is not permitted” (49 C.F.R. § 1104.13(c)). *See East-West Resort Transp’n, LLC, and TMS, LLC D/B/A Colorado Mtn. Exp. – Pet. for Decl. Order – Mot. Car. Transp’n of Passengers in Colo.*, No. MC-F-21008 (S.T.B. served Apr. 8, 2005) (where a reply to a reply is submitted “on the ground that the record is incomplete due to certain

representations made in [the other party's] reply," the submitter "has not shown good cause to allow the filing of a reply to a reply"). *Accord Norfolk So. Ry. Co. and Alab. Great So. R.R. Co. – Pet. for Decl. Order*, Finance Dkt. No. 35196, slip op. at 2 n.3 (S.T.B. served Mar. 1, 2010). In this instance also, the Board should conclude that "[t]he Board's rules preclude acceptance of a reply to a reply... [and that Megabus] has not provided sufficient reason for the Board to make an exception to this rule." See *Union Pac. R.R. Co. – Abandonment – in New Madrid, Scott, and Stoddard Counties, Mo.*, No. AB-33 (Sub-No. 261), slip op. at 2 (S.T.B. served Sept. 10, 2009).

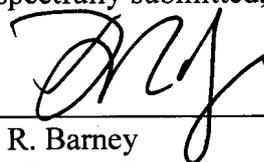
For the record, Greyhound and Peter Pan hereby reject as unfounded, for the same reasons set forth in our March 28, 2011, Opposition to the Petition, the arguments that Megabus – which according to its own statement "does not even operate between Newark and Washington," the points at issue here (Reply at 7) – presents in its Reply.

For all these reasons, the Board should deny Megabus's Motion to File a Reply.

Dated: March 31, 2011

Respectfully submitted,

By:   
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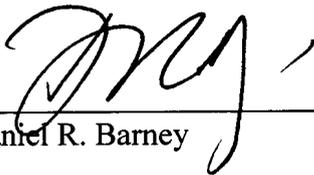
**CERTIFICATE OF SERVICE**

I certify that I have, this 31st day of March 2011, served copies of the foregoing letter and enclosed Opposition to Ms. Cynthia T. Brown, Chief, Section of Administration, Office of Proceedings, Surface Transportation Board, dated March 31, 2011, on the following by email and First Class Mail –

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and on the following by First Class Mail –

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Daniel R. Barney