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March 2, 2004

VIA HAND DELIVERY

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Honorable Vernon A., Williams
Secretary
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423

Re: MC-F-21005, Coach USA, Inc. -- Intra-Corporate Transaction

Dear Secretary Williams:

This concerns the Verified Notice of Exempt Transaction filed in the above matter on February 11, 2004. That filing concerns an internal reorganization of the ownership of Coach USA, Inc., a non-carrier that owns numerous federally-regulated motor passenger carriers.

The Verified Notice explained that there will be a series of stock transactions such that a U.S. non-carrier corporation, Coach Administration, Inc., will become the sole shareholder of Coach USA, Inc., replacing a Nevada partnership that is currently Coach's immediate parent. The Notice also explained that the shares of Coach Administration, Inc. will initially be split equally between United Kingdom corporations, but eventually will be transferred entirely to one of those two UK corporations.

At the time of the filing, the identity of these UK corporations was not known. While it is still possible that there could be some change in the identity of these corporations, it currently appears that they will be SCUSI Limited and SCOTO Limited, both of which are headquartered at Wessex House, 231-232 Blackfriars Road, London SE1 8NW, England. Further, it is currently contemplated that, as part of the transaction described in the Notice, SCOTO Limited will transfer all of its Coach Administration, Inc. shares to SCUSI Limited, leaving that latter entity as the sole owner of Coach Administration, Inc.

Further, the Board should be advised that while, at the time the Notice was filed, it was anticipated that the two UK entities described therein would not be entities that own or control any

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motor passenger carriers, both SCOTO Limited and SCUSI Limited are currently in the ownership chain of Coach USA, Inc. Both are currently general partners in the Nevada partnership that is the immediate parent of Coach USA, Inc., and both are wholly owned by Stagecoach Group plc, the ultimate parent of Coach USA, Inc.

Finally, the closing date for this transaction, initially planned for February 19, 2004, has been rescheduled for March 10, 2004.

I look forward to responding to any questions that you might have concerning this transaction.

Respectfully,

A handwritten signature in black ink, appearing to read "David H. Coburn", with a long horizontal flourish extending to the right.

David H. Coburn
Attorney for Coach USA, Inc.