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December 1, 2009

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

Re: **MC-F-21035, Stagecoach Group plc and Coach USA, Inc., et al.— Acquisition of Control — Twin America, LLC**

Dear Ms. Brown:

Commenter New York State Attorney General (“NYSAG”) has submitted a November 25, 2009 letter to the Board asking for the opportunity, “at the STB’s discretion,” to submit a reply to the November 17, 2009 Reply of Applicants in this motor carrier control proceeding. The Board’s general rules of practice indicate that, “a reply to a reply is not permitted.” 49 CFR 1104.13(c). *See also* 49 CFR 1182.6 (providing no opportunity for a reply to applicant’s reply in a motor carrier control proceeding). Further, NYSAG has not offered a sufficient reason to justify departure from these rules, as the NYSAG had ample time to prepare its November 2 filing and anything it properly wanted to raise at that time could have been included then.

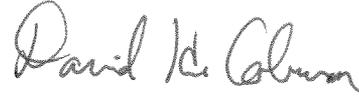
Applicants, moreover, responded fully to the November 2 comments filed by the NYSAG in a timely and complete fashion. The record in this matter is now sufficient to allow the Board to render a decision approving the application for control. Applicants seek a prompt determination on their control application so that Twin America can conduct and enhance its carrier business without the uncertainty posed by the pending NYSAG investigation. Another round of submissions could delay a Board decision that applicants trust will remove that uncertainty.

Should the Board decide to allow the NYSAG to file a reply, however, Applicants respectfully request that the Board also allow Applicants to submit a surreply. Doing so would be consistent with the Board’s policy, reflected in its rules at section 1182.6, of allowing the Applicants to make the final

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submission in support of their application, affording Applicants a full opportunity to respond to all opposition comments.

Respectfully,



David H. Coburn

Attorney for Applicants Stagecoach Group plc;
Stagecoach Transport Holdings plc.; SCUSI Ltd.;
Coach USA Administration, Inc.; Coach USA, Inc.;
International Bus Services, Inc.; CitySights Twin,
LLC; Mr. Zev Marmurstein; and Twin America,
LLC

cc: All parties of record