

September 2, 2026

Mr. Matthew Cahill
Acting Deputy Administrator
Federal Transit Administration
1200 New Jersey Ave. SE
Washington, DC 20590

**Re: Supplemental Notice of Partial Buy America Waiver for Minibuses Request for Comment
(Docket No. FTA–2024–0018)**

Dear Acting Deputy Administrator Cahill,

The American Public Transportation Association (APTA) represents a \$102 billion industry that directly employs more than 450,000 people and supports millions of private-sector jobs. We greatly appreciate the opportunity to respond to the Federal Transit Administration’s (FTA) Supplemental Notice of Partial Buy America Waiver for Minibuses Request for Comment (Docket No. FTA–2024–0018), published in the Federal Register at 91 FR 53478 on August 18, 2026. Our members include more than 350 U.S. public transit agencies. These agencies provide myriad public transportation services, and their fleets often include smaller vehicles, such as cutaways, vans, and minivans.

APTA strongly supports Buy America and applauds the Administration’s continued efforts to ensure the use of American-made materials in FTA-funded projects. These Buy America requirements are critical to U.S. job creation, timely project delivery, quality, and building U.S. manufacturing capacity. To help achieve these Buy America goals, APTA strongly supports the phased three-year general non-availability waiver of Buy America requirements proposed by FTA for minibuses used in public transportation.

On November 18, 2024, FTA issued a five-year partial, time-limited general unavailability waiver of Buy America for vans and minivans because FTA was unable to identify any manufacturer of non-Americans with Disabilities Act (ADA)-accessible vans and minivans that fully complies with Buy America. APTA had urged FTA to issue the waiver and strongly supports it.

Similarly, on December 20, 2024, FTA proposed a phased three-year general non-availability waiver for battery-electric minibuses used in public transportation. On January 5, 2025, APTA submitted comments strongly supporting the proposed minibus waiver for the same reason: the unavailability of Buy America-

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compliant battery-electric minibuses. FTA received letters of support for the waiver from more than 150 public transit agencies across the country.

On August 18, 2026, FTA issued a supplemental notice regarding whether the agency should remove the proposed requirement that the minibuses be battery-electric propulsion. APTA supports this revision to the proposed non-availability waiver and believes that public transit agencies are best positioned to decide the propulsion type that is best suited for their operations and communities.

Granting the waiver will enable public transportation agencies to procure minibuses with Federal transit funds, providing safe, accessible, and family-friendly transportation to thousands of transit riders. The use of large buses to serve on-demand and paratransit needs typically is neither economical nor operationally feasible. APTA members deploy smaller vehicles for on-demand, paratransit, and carpool services. These smaller vehicles are sized to serve these highly specialized markets in a cost-effective manner.

Over the past several years, the APTA Bus Manufacturing Task Force has worked together with bus manufacturers, suppliers, and public transit agencies to build a more competitive, financially stable bus manufacturing capacity in this country. These efforts are critical to strengthening public transit services and expanding U.S. bus manufacturing. Unfortunately, more work is required to ensure that all types of public transit vehicles, including minibuses, vans, and minivans, can be manufactured in the U.S. in compliance with Buy America.

In 2024, FTA concluded that there were no electric minibuses available in the United States that meet FTA's domestic content or final assembly requirements under Buy America. The proposed waiver will provide a phased three-year transition for building U.S. capacity to manufacture minibuses. Moreover, the procurement of minibuses during the transition period will help demonstrate to manufacturers and suppliers that there is a strong and long-term market in the United States for U.S.-manufactured and U.S.-assembled minibuses and bus components. APTA supports FTA's revision to the proposed non-availability waiver to remove the requirement that the minibuses be battery electric.

APTA expresses its appreciation to FTA for proposing the phased three-year non-availability waiver and commits to continue working with FTA and the public transportation industry to build a more competitive, financially stable, and Buy America-compliant public transit vehicle manufacturing capacity.

If you have questions regarding this letter, please contact Ward W. McCarragher, Vice President, Government Affairs and Advocacy, at wmccarragher@apta.com, or Taria Barron, General Counsel, at tbarron@apta.com.

Thank you for your consideration and support for public transportation in the United States.

Sincerely,



Paul P. Skoutelas
President and CEO