



**American  
Public Transportation  
Association**

---

**EXECUTIVE COMMITTEE**

CHAIR

MJ Maynard

VICE CHAIR

Leanne Redden

SECRETARY-TREASURER

Jeffrey Wharton

IMMEDIATE PAST CHAIR

Michele Wong Krause

Jose R. Bustamante

Randy Clarke

Alexander Clifford

Francis "Buddy" Coleman

Charles DiMaggio

Shawn Donaghy

Denise Figueroa

Sharon Fleming

Gary S. Giovanetti

Carolyn Gonot

Collie Greenwood

Beth Holbrook

Debra A. Johnson

Bacarra Mauldin

Raymond Melleady

Erin Rogers

Catherine Rinaldi

Kimberly Slaughter

Doug Tisdale

Jannet Walker-Ford

Joel Young

---

**PRESIDENT AND CEO**

Paul P. Skoutelas

1300 I Street NW  
Suite 1200 East  
Washington, DC 20005  
p: (202) 496-4800  
f: (202) 496-4324

---

**APTA.COM**

January 7, 2025

Ms. Sophie Shulman  
Deputy Administrator  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
Docket Operations  
M-30, West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Subject: HOLON U.S., Inc.—Receipt of Petition for Temporary Exemption from Various Requirements of the Federal Motor Vehicle Safety Standards for an Automated Driving System-Equipped Vehicle (NHTSA-2024-0067)**

Dear Deputy Administrator Shulman,

The American Public Transportation Association (APTA) represents a \$79 billion industry that directly employs 430,000 people and supports millions of private-sector jobs. Our members span the breadth of the public transportation industry, from agencies and contractors to manufacturers and consultants, and they deliver unique services for their communities with innovative mobility solutions. We greatly appreciate the opportunity to respond to the HOLON U.S. Inc. petition (Docket No. NHTSA-2024-0067) currently being considered by the National Highway Traffic Safety Administration (NHTSA), published in the *Federal Register* at 89 FR 88856 on November 8, 2024.

APTA strongly supports public transit agencies' ability to deploy innovative technologies and services that assist in advancing mobility. These innovations allow agencies to offer new or expanded services and increase efficiency. Agencies can implement what works best for their service areas and customers with much needed flexibility from the U.S. Department of Transportation.

Public transit agencies are working to advance autonomous vehicles as one of the most potentially impactful mobility innovations. Autonomous vehicles present new opportunities for our member agencies to expand their service

footprint, meet customer needs, and increase efficiency.<sup>1</sup> These operations also create new jobs and opportunities for communities.

However, current regulations hamper public agencies from fully utilizing autonomous vehicles. HOLON and HOLON U.S. Inc. are seeking a waiver from several Federal Motor Vehicle Safety Standards to build and operate its “automated electric bus”, which is a vehicle equipped with an Automated Driving System (ADS), in the United States. APTA urges NHTSA to fully consider this and similar petitions.

APTA believes ADS technology has a potential transformative impact on public transportation and could provide significant public interest benefits, including:

- Providing a lifeline for public transit agencies that are struggling to procure sufficient transit vehicles and hire the necessary operators to maintain service to their communities;
- Improving access and equity by extending public transit to increase frequency, better connect historically underserved areas and individuals with disabilities, and augment first-, last-, and only-mile services;
- Advancing technological innovation in our industry and ensuring the U.S. provides global leadership in this technology;
- Establishing the necessary foundation to onshore an additional U.S.-based bus manufacturer that can serve the industry and send a strong market signal to other potential manufacturers that there is a viable path to market;
- Creating new jobs in manufacturing, software development, battery electric vehicle maintenance, and management for this cutting-edge technology; and
- Reducing traffic congestion and greenhouse gas emissions.

Moreover, NHTSA has noted that ADS technology, including technology contemplating no human driver, has the potential to significantly improve roadway safety in the United States.<sup>2</sup> APTA urges NHTSA to work closely with petitioners to ensure ADS technologies provide an equivalent or greater level of safety as required by the National Traffic and Motor Vehicle Safety Act.

Finally, APTA urges NHTSA to update its regulations to provide a comprehensive Federal framework to allow more public transit agencies to use autonomous vehicles to provide safe, sustainable, accessible, and convenient public transportation.

---

<sup>1</sup> See Federal Transit Administration, [Transit Bus Automation Market Assessment](#), FTA Report No. 0255 (September 2023).

<sup>2</sup> NHTSA, [Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Automated Vehicle Transparency and Engagement for Safe Testing \(AV TEST\) Initiative](#), 88 Fed. Reg. 42421 (June 30, 2023).

Deputy Administrator Shulman

January 7, 2025

Page 3

If you have any questions regarding this letter, please contact Ward McCarragher, Vice President, Government Affairs and Advocacy, at [wmccarragher@apta.com](mailto:wmccarragher@apta.com).

Thank you for your consideration.

Sincerely,



Paul P. Skoutelas  
President and CEO

cc: Ms. Veronica Vanterpool, Deputy Administrator, Federal Transit Administration