



The Honorable Pete Buttigieg
Secretary of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

October 3, 2022

Dear Mr. Secretary,

Thank you for your leadership in implementing the historic Bipartisan Infrastructure Law. This investment in our infrastructure comes as a critical time as the nation emerges from the COVID-19 pandemic and navigates ongoing supply chain and inflation issues.

The undersigned organizations, led by the Community Transportation Association of America's (CTAA), write today to bring awareness to a burgeoning crisis in the small bus industry that threatens the ongoing operations of rural, small-city, paratransit and non-emergency medical transportation providers across the nation. Today, the demand for small buses, particularly body-on-chassis vehicles, far outstrips supply with estimates of 20,000 small bus purchases currently backlogged.

We need your assistance in securing more chassis for the small bus marketplace so the trips to vital health care appointments (like dialysis); to congregate meal sites and grocery stores; to work and education; and to other social services that these types of buses typically serve can safely continue. In addition, the current environment creates an opportunity to promote flexibility, competition, and innovation by streamlining the procurement regulations for small buses.

Recent dialogue among transit agencies, state departments of transportation, bus dealers and bus manufacturers highlight the current state of the small bus marketplace:

- A survey of State Departments of Transportation (State DOTs) last month revealed that three quarters of State DOTs are feeling an unprecedented level of concern regarding standard vehicle replacements and maintaining a state of good repair,

with more than one-half of agencies having had a small bus purchasing contract or agreement terminated in 2022;

- Bus dealers predict the small bus backlog, nationally, to eclipse 20,000 in 2023, and expect full recovery of the market to take five to seven years;
- The largest small bus manufacturer currently has one of seven manufacturing facilities up-and-running, and can only meet 25 percent of demand; and
- Prices for these vehicles are running 30 percent to 70 percent above pre-pandemic levels.

With the Biden Administration's leadership in enacting the Infrastructure Investment and Jobs Act (IIJA), public transit providers have record levels of federal capital investment. However, the small bus manufacturing backlog and price inflation threaten to stifle the IIJA's impact on transit service delivery in communities across the country. The positive impact of the IIJA's generational infrastructure investment is surely threatened by this situation.

The undersigned transit industry partners are actively working together to collaborate and support each other throughout this challenging time. Working together, we have developed a number of potential solutions for your consideration, including:

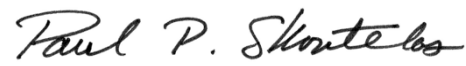
- Encourage chassis manufacturers, particularly Ford, to set aside units for vital public transportation and for small buses.
- Streamline current procurement regulations, with an emphasis on flexibility, because of the unprecedented nature of current small bus crisis. Use the vehicle backlog, nationally, to determine the timeframe for these procurement process changes.
- Expand the Federal Transit Administration's (FTA) proposed Buy America general nonavailability waiver for passenger vans (87 Fed. Reg. 43101) to include waiving Buy America requirements for small buses and vans when manufacturers are not able to guarantee delivery within 12 months or less of an order. Use this temporary waiver to incent manufacturers to locate production facilities in the United States.
- Offer clear guidance to FTA grantees on whether, when, and how to amend bus procurements or reprogram funds when vehicles as specified cannot be delivered under the terms of a procurement agreement.

In summary, we strongly encourage the U.S. Department of Transportation to help the public transit industry secure additional chassis for the small bus market. It is critical to our shared goal of ensuring that the Bipartisan Infrastructure Law provides unparalleled opportunities to all Americans. We would surely welcome any opportunity to discuss this critical subject further.

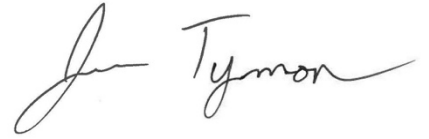
Sincerely,

Handwritten signature of Scott Bogren in black ink, featuring a stylized 'S' and 'B' followed by a horizontal line.

Scott Bogren
Executive Director
CTAA

Handwritten signature of Paul P. Skoutelas in black ink, written in a cursive style.

Paul P. Skoutelas
President and CEO
APTA

Handwritten signature of Jim Tymon in black ink, written in a cursive style.

Jim Tymon
Executive Director
AASHTO

Vermont Agency of Transportation
Barre, VT

Nebraska Association of Transportation
Providers
Milford, NE

Tennessee Public Transportation
Association
Nashville, TN

Georgia Transit Association
Marietta, GA

Transportation Association of Maryland
Linthicum, MD

Prairie Hills Transit
Spearfish, SD

TransAction Corporate Shuttles, Inc.
Woburn MA

New Mexico Department of Transportation
Santa Fe, NM

Call a Ride Service, Inc.
Lewistown, PA

Utah State University Aggie Shuttle
Logan, Utah

Southern Georgia Regional Commission
Georgia

Starkville Mississippi State Area Rapid
Transit
Mississippi State, MS

Rogue Valley Transportation District
Medford, OR

Ohio Department of Transportation
Ohio

Washington State Transit Association
Washington

River Bend Transit
Davenport, IA

Arkansas Transit Association
Arkansas

Mercer County Trade Trenton,
NJ

Oklahoma Transit Association
Oklahoma

Coordinated Transportation Solutions
Trumbull, CT

Alabama DOT
Alabama

Special Services Transportation Agency
Colchester, VT

Tri-Valley Transit
Middlebury VT

Claiborne County Human Resource Agency
Port Gibson, MS

Alaska Mobility Coalition
Anchorage, AL

Oklahoma Department of Transportation
Oklahoma City, OK

California Association for Coordinated
Transportation (CALACT)
Sacramento, CA

Fairmont-Marion County Transit Authority
Fairmont, WV

North Carolina Public Transit Association
North Carolina

Kentucky Public Transit Association
Kentucky

Illinois Public Transit Association
Illinois

Minnesota Department of Transportation
St. Paul, Minnesota

TPRG
Cocoa Beach, FL

Community Transportation Association of
the Northwest
Oregon and Washington

Community Transportation Association of
Virginia
Radford, Virginia

Missouri Public Transit Association
Missouri

Florida Public Transportation Association
Tallahassee, FL

The Bus Coalition
Nationwide

Michigan Public Transit Association.
Lansing, Michigan

Michigan Transportation Connection, Inc.
East Lansing

Upper Cumberland Human Resource
Agency
Cookeville Tennessee

California Department of Transportation
California

River Cities Public Transit
Pierre, South Dakota

Michigan Department of Transportation
Michigan

SporTran
Shreveport, LA

Maricopa Association of Governments
Phoenix, Arizona

NJ Transit Corp.
Newark, NJ

MDOT MTA
Maryland

Siouxland Regional Transit System
Sioux City, Iowa

South Dakota Department of
Transportation
Pierre, SD

Ionia Dial-A-Ride
Ionia, Michigan

Virginia Department of Rail and Public
Transportation
Richmond, Virginia

MIDAS Council of Governments
Fort Dodge, IA

Vermont Clean Cities Coalition
Burlington, VT

Division of Multimodal Transportation
Facilities, Division of Public Transit, West
Virginia Department of Transportation
Charleston, WV

South West Transit Association
Fort Worth, Texas

Texas Transit Association - TTA
Austin, Texas

MS Department of Transportation
Mississippi

Southeast Vermont Transit
Vermont

Gifford Health Care
Randolph, Vermont

Community Transit of Watertown/Sisseton,
Inc.
Watertown, SD

Two Rivers-Ottawaquechee Regional
Commission
Woodstock, Vermont

Senior Solutions Council on Aging
Southeastern, VT

Age Well, Inc.
Vermont

Upper Valley Services
Bradford, VT

Senior Solutions
Springfield, VT

Mississippi Public Transit Association
Natchez, Mississippi

Natchez Transit Regional Center
Natchez, Mississippi

Natchez Senior Citizen's Multipurpose
Center Natchez, Mississippi