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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**IN THE MATTER OF

VAN POOL TRANSPORTATION LLC

– ACQUISITION OF CONTROL –

EASTON COACH COMPANY, LLC

DOCKET NO. MCF 21097**

**VERIFIED APPLICATION UNDER 49 U.S.C. § 14303(a)
FOR APPROVAL OF THE ACQUISITION OF CONTROL OF
EASTON COACH COMPANY, LLC
BY VAN POOL TRANSPORTATION LLC**

Van Pool Transportation LLC (“Applicant”) respectfully submits this verified application under 49 U.S.C. § 14303 and Surface Transportation Board (the “STB” or “Board”) regulations at 49 C.F.R. Part 1182 (this “Application”) for approval of the contemplated transaction more fully described herein (the “Transaction”). The Transaction entails the direct acquisition of control by Applicant of the regulated interstate passenger motor carrier, Easton Coach Company, LLC (“Easton”), from ECC Holding Company, Inc. (“Seller”). As explained below, the portion of the passenger transportation business of Easton that involves interstate passenger trips, and correspondingly requires interstate passenger motor carrier authority, is relatively small. For the reasons described herein, approval of the Transaction is consistent with the public interest.

**FILED
June 16, 2021
SURFACE
TRANSPORTATION BOARD**

**FEE RECEIVED
June 16, 2021
SURFACE
TRANSPORTATION BOARD**

I. Parties of the Transaction, Pertinent Operating Authorities, and USDOT Safety Fitness Ratings (49 C.F.R. § 1182.2(a)(1) and (2)).¹

A. Purchaser: Applicant. Applicant is a Delaware limited liability company, headquartered at 70 Post Office Park, Suite 7003, Wilbraham, MA 01095. Applicant is not a federally-regulated carrier, and Applicant has neither a USDOT Number nor a USDOT Safety Rating; however, Applicant owns and controls all of the equity and voting interest in three (3) interstate passenger motor carriers (described below) that are among its operating subsidiaries (the “Applicant Subsidiaries”). Applicant, with the Applicant Subsidiaries, are experienced and reliable providers of transportation services to the public, delivering passenger transportation and mobility solutions for regional transit authorities, school districts, health insurance companies, retirement communities, other organizations, and the traveling public in the New England Area of the United States. Among the Applicant Subsidiaries are three (3) passenger motor carriers that hold interstate passenger motor carrier authority: NRT Bus, Inc. (“NRT”), Trombly Motor Coach Service, Inc. (“Trombly”), and Salter Transportation, Inc. (“Salter,” and together with NRT and Trombly, the “Affiliate Regulated Carriers”). The services provided by Applicant and the Applicant Subsidiaries, excluding the Affiliate Regulated Carriers, do not involve regulated interstate transportation or require interstate passenger authority, and the services provided by the Affiliate Regulated Carriers that require interstate passenger motor carrier authority (interstate charter) are a very small and limited part of those services.

B. Affiliate Regulated Carriers of Applicant. Applicant owns and controls the following passenger motor carriers that hold interstate passenger motor carrier authority:

¹ This Application is organized to follow the elements set forth in the applicable rules of the Board at 49 C.F.R. § 1182.2(a).

(i) NRT. NRT is a Massachusetts corporation, providing primarily non-regulated school bus transportation services in the commonwealth of Massachusetts, and occasional charter services at times that its vehicles are not in use for school activities. The geographic service area of NRT is all within the commonwealth of Massachusetts, east and north of the city of Worcester, and north of the city of Boston, providing services in the counties of Essex, Middlesex, Norfolk, Suffolk and Worcester. Aggregate charter services of NRT currently represent less than 2% of NRT's annual revenue, and interstate charter services represent less than 0.02% of that annual revenue. The USDOT Number assigned to NRT is 1166825, and NRT has a "Satisfactory" USDOT Safety Rating. For purposes of its interstate passenger operations (which are limited to occasional charter services), NRT holds interstate carrier operating authority under Federal Motor Carrier Safety Administration ("FMCSA") Docket No. MC-595581. NRT's principal place of business is located at 55 Hampshire Road, Methuen, MA 01844. In providing its services, NRT uses approximately 1,490 passenger carrying vehicles (consisting of 679 school buses, 267 16+ passenger mini-buses, and 366 1-8 passenger vans, and 178 9-15 passenger vans) and approximately 1,221 drivers. All of NRT's passenger vehicles are utilized for student transportation services, with the vast majority of its smaller vehicles being outfitted/equipped for students with special needs.²

² John J. McCarthy ("Mr. McCarthy"), already in control of NRT, acquired Trombly from Michael J. Trombly ("Mr. Trombly") in a transaction closed on April 13, 2013; however, neither Mr. McCarthy nor Mr. Trombly was at that time aware that the transaction required approval of the Board. In that respect, Mr. McCarthy on May 4, 2021, filed his application (*John J. McCarthy – Acquisition of Control – Trombly Motor Coach Services, Inc.*, STB Docket No. MCF 21094) requesting the Board's approval of that transaction. Said application is currently pending, and Mr. McCarthy is in the process of providing a supplement to such application per the request of the Board.

(ii) Trombly. Trombly is a Massachusetts corporation with its primary place of business at 16 Commercial Drive, Dracut, MA 01826. Trombly, like NRT, primarily provides non-regulated school bus transportation services in the commonwealth of Massachusetts, and occasional charter services at times that its buses are not in use for school activities. The geographic service area of Trombly is primarily the Merrimack Valley within the commonwealth of Massachusetts, with services being provided in the counties of Essex and Middlesex. Aggregate charter services currently represent less than 2% of Trombly’s annual revenue, and interstate charter services represent less 0.02% of that annual revenue. The USDOT Number assigned to Trombly is 106905. For purposes of its interstate passenger operations (which are also limited to occasional charter services), Trombly holds interstate carrier operating authority under FMCSA Docket No. MC-116313. Trombly, has a “Satisfactory” USDOT Safety Rating. In providing its services, Trombly uses approximately 266 passenger vehicles (consisting of 126 school buses, 25 16+ passenger mini-buses, 82 1-8 passenger vans, and 33 9-15 passenger vans) and approximately 142 drivers. Similar to NRT, all of Trombly’s passenger vehicles are utilized for student transportation services, with the vast majority of its smaller vehicles being outfitted/equipped for students with special needs.³

(iii) Salter. Salter is a Massachusetts corporation, providing primarily non-regulated school bus transportation services in the commonwealth of Massachusetts

³ Applicant acquired NRT and Trombly from Mr. McCarthy in a transaction closed on September 30, 2019; however, neither Applicant nor Mr. McCarthy was at that time aware that the transaction required approval of the Board. In that respect, Applicant on May 4, 2021, filed its application (*Van Pool Transportation LLC – Acquisition of Control – NRT Bus, Inc. and Trombly Motor Coach Services, Inc.*, STB Docket No. MCF 21095) requesting the Board’s approval of that transaction. Said application is currently pending, and Applicant is in the process of providing a supplement to such application per the request of the Board.

and the state of New Hampshire, and occasional charter services at times that its buses are not in use for school activities. The geographic service area of Salter is southern New Hampshire and the North Shore area in Massachusetts (Essex County). Similar to NRT and Trombly, aggregate charter services currently represent less than 2% of Salter's annual revenue, and interstate charter services represent less than 0.02% of that annual revenue. The USDOT Number assigned to Salter is 2446427, and Salter has a "Satisfactory" USDOT Safety Rating. For purposes of its interstate passenger operations (which are likewise limited to occasional charter services), Salter holds interstate carrier operating authority under FMCSA Docket No. MC-190881. Salter's principal place of business is located at 196 Scotland Road, Newbury, MA 01951. In providing its services, Salter uses approximately 137 passenger carrying vehicles (consisting of 119 school buses and 18 16+ passenger mini-buses), and approximately 103 drivers. Similar to NRT and Trombly, all of Salter's passenger vehicles are utilized for student transportation services, with a number of its smaller vehicles being outfitted/equipped for students with special needs.⁴

C. Seller. Seller is a Delaware corporation having its headquarters at 1200 Conroy Place, Easton, PA 18040. All of the issued and outstanding membership interests in Easton are held by Seller, and Seller does not own or control any interstate passenger motor carrier other than Easton. Seller is majority-owned by David M. Boucher, an individual

⁴ Applicant acquired Salter from Stephen O. Gadd in a transaction closed on June 12, 2020; however, neither Applicant nor Mr. Gadd was at that time aware that the transaction required approval of the Board. In that respect, Applicant on May 4, 2021, filed its application (*Van Pool Transportation LLC – Acquisition of Control – Salter Transportation, Inc.*, STB Docket No. MCF 21096) requesting the Board's approval of that transaction. Said application is currently pending and Applicant is in the process of providing a supplement to such application per the request of the Board.

resident of the state of South Carolina. Seller is not a carrier, and Seller has neither a USDOT Number, interstate passenger carrier authority, nor a USDOT Safety Rating.

D. Easton. Easton is a Delaware limited liability company headquartered at 1200 Conroy Place, Easton, PA 18040. The USDOT Number assigned to Easton is 1020738. As its service offerings, Easton provides (i) intrastate paratransit, shuttle and line-run services under contracts with regional transportation authorities and other organizations, primarily in eastern Pennsylvania and the state of New Jersey (the “Paratransit and Shuttle Services”), and (ii) private charter motor coach services, interstate and intrastate, primarily in eastern Pennsylvania, including coach and shuttle ground transportation services for passengers (the “Charter Coach Services”). In providing the aggregate of its service offerings, Easton utilizes approximately 750 passenger carrying vehicles (consisting of 275 1-8 passenger vehicles, 397 9-15 passenger vans, and 78 16+ passenger mini-buses, shuttle buses and motorcoaches), and approximately 800 drivers. For purposes of the interstate portion of its Charter Coach Services, Easton holds interstate carrier operating authority under FMCSA Docket No. MC-430400. Easton has a “Satisfactory” USDOT Safety Rating. In providing its interstate charter passenger services, Easton currently utilizes approximately 21 motor coaches (included within the aforementioned aggregate of 750 passenger carrying vehicles) and 30 drivers. By revenue, Easton’s Paratransit and Shuttle Services generate approximately 92.3% of its aggregate annual revenue, while Charter Coach Services generate the other 7.7% of its aggregate annual revenue. The geographic areas of Easton’s service offerings (Paratransit and Shuttle Services and Charter Coach Services) do not overlap with the geographic areas of the service offerings of Applicant and the Applicant Subsidiaries.

E. Summary Table. A summary table of the USDOT Numbers, FMCSA Docket Numbers, and USDOT Safety Ratings of Applicant, the Affiliate Regulated Carriers, Seller and Easton is attached hereto as Exhibit A.

II. Description of the Transaction (49 C.F.R. § 1182.2(a)(3)).

The event triggering STB jurisdiction over the Transaction is the acquisition of the issued and outstanding equity interests in Easton by Applicant, the effect of which will be to place Easton under the control of Applicant. As such, STB's jurisdiction is invoked by 49 U.S.C. § 14303(a)(5), as the Transaction will entail the "acquisition of control of a carrier [*i.e.*, Easton] by a person that is not a carrier but that controls any number of carriers [*i.e.*, Applicant]."

III. Other Federally Regulated Carrier Affiliates (49 C.F.R. § 1182.2(a)(4)).

Other than the Affiliate Regulated Carriers and Easton as described above, there are no other carriers with regulated interstate operations involved in this Application. The Transaction will result in Easton being acquired, owned and controlled by Applicant, and Seller having no control of any regulated interstate passenger carrier. The intercorporate structure of Applicant is as follows:

Applicant is wholly owned by VP Intermediate Company, a Delaware corporation and non-carrier holding company ("VP Intermediate"). VP Intermediate is wholly owned by Beacon Mobility Corp., a Delaware corporation and non-carrier holding company ("Beacon"). Beacon is wholly owned by Van Pool Intermediate, Inc., a Delaware corporation and non-carrier holding company ("Intermediate Inc."). Intermediate Inc. is wholly owned by Van Pool Group Holdings, L.P., a Delaware limited partnership and non-carrier holding company ("Group Holdings"). Group Holdings is majority-owned and controlled by AG Van Pool Holdings, LP, a Delaware limited partnership and non-carrier holding company ("AG

Holdings”). AG Holdings is owned by investment funds affiliated with Audax Management Company, LLC, a Delaware limited liability company (the “Audax Funds”). A chart depicting the intercorporate structure of Applicant is set forth on Exhibit B attached hereto. Neither the Audax Funds, AG Holdings, Group Holdings, Intermediate Inc., Beacon, nor VP Intermediate has interstate passenger motor carrier authority, a USDOT Number, nor a USDOT Safety Rating. Additionally, neither the Audax Funds, AG Holdings, Group Holdings, Intermediate Inc., Beacon, nor VP Intermediate controls any regulated interstate passenger carriers other than as set forth in this Application.

IV. Jurisdictional Statement – Revenues (49 C.F.R. § 1182.2(a)(5)).

The STB has jurisdiction over this matter under 49 U.S.C. § 14303(g), because the annual aggregate gross operating revenues of Applicant and Easton exceeded \$2 million during the 12-month period immediately preceding the filing of this Application.

V. Environmental Impact (49 C.F.R. § 1182.2(a)(6)).

Approval of this Application and consummation of the Transaction will not have a significant effect on the quality of the human environment and the conservation of energy resources. The Transaction is merely a change in control of a carrier that already provides intrastate paratransit, shuttle and line-run services, and private charter motor coach services. No environmental impact is expected.⁵

VI. Public Interest Considerations (49 C.F.R. § 1182.2(a)(7)).

The Board “shall approve and authorize a transaction” when it finds that the transaction is “consistent with the public interest.” 49 U.S.C. § 14303(b). The statutory

⁵ The Board has found similar transactions to be categorically excluded from environmental review under 49 C.F.R. § 1105.6(c). *See, e.g., All Aboard America! Holdings, Inc. – Acquisition of Control – Lux Bus America Co.*, STB Finance Docket No. MCF 21082, at 5 (STB served Sept. 21, 2018). Section 1105.6(c) categorically excludes Section 14303 transactions that do not implicate operational changes that exceed certain specified thresholds.

factors the Board must consider are the “adequacy of transportation to the public,” “total fixed charges that result...” and the “interest of carrier employees affected...” *Id.*

A. Adequacy of Transportation Services. The Transaction will not have a material, detrimental impact on the adequacy of transportation services available for the public. Applicant intends that the services of Easton currently available to the public will be maintained and continue to be provided by Easton under the same name used to provide such services prior to the Transaction. Easton will continue to operate, but going forward, will continue to be operated within the holdings of Applicant, an organization thoroughly experienced in passenger transportation operations.

The addition of Easton to the holdings of Applicant is consistent with the practices within the passenger motor carrier industry of strong, well-managed transportation organizations adapting their corporate structure to operate several different passenger carriers within similar services markets, but in different geographic areas. The Transaction will bring Easton under the control of Applicant, which is experienced in the same market segments served by Easton, being intrastate paratransit, shuttle and line-run services, and private charter services market segments. Such market segments have their own service characteristics, and the Transaction, combined with the passenger carrier management capacity of Applicant, is expected to result in improved operating efficiencies, increased equipment utilization rates, and cost savings derived from economies of scale within the Applicant Subsidiaries, all of which will help to ensure the provision of adequate service to the public.

The addition of Easton to Applicant’s organization will serve to enhance the viability of Applicant’s organization and the Applicant Subsidiaries. The continued viability of Applicant and the Applicant Subsidiaries assures the continued availability of adequate

passenger transportation service for the public in the areas served by the Applicant Subsidiaries.

B. Fixed Charges. The Transaction will increase fixed charges, in the form of interest expense, because funds will be borrowed to assist in the financing of the Transaction. However, such an increase will not impact the provision of transportation services to the public. The Board has approved transactions that use debt financing in the past, despite some increase to interest expense. See, *e.g.*, *Variant Equity I, LP, and Project Kenwood Acquisition, LLC – Acquisition of Control – Coach USA Administration, Inc., and Coach USA, Inc.*, STB Docket No. 21084, at 4 (served February 15, 2019), and *Sureride Charter Inc. – Acquisition of Control – McClintock Enterprises, Inc., D/B/A Goldfield State & Co.*, STB Docket No. 21077, at 3 (served November 2, 2017).

C. Employee Interests. Applicant intends to continue the existing operations of Easton and as such, the Transaction will not substantially impact employees or labor conditions. Applicant does not anticipate a measurable reduction in force or changes in compensation levels and/or benefits at Easton, although staffing redundancies could potentially result in limited downsizing of back-office and/or managerial level personnel.

D. Competition and the Public Interest. The law requires the Board to assess competition in the market and the impact on the public interest as affected by approving an arrangement in which multiple passenger carriers are under control of a single entity. In making such analysis, the Board (as did its predecessor, the Interstate Commerce Commission) has consistently found that proposed “common control” arrangements (however accomplished) are inherently not anti-competitive. In large measure, that conclusion rests on the finding that as a result of the ease of entry into the market, the passenger motor carrier industry is characterized by healthy intra-modal competition as well as healthy competition

between bus service, on the one hand, and, on the other, other modes of transportation, all of which constitute the “relevant market.” *GLI Acquisition Co – Purchase – Trailways Lines, Inc.*, 4 I.C.C. 2d 591, 598-602 (1988).

On the rare occasions in recent years in which the Board has been called upon to assess the “public interest” and “competition” issues inherent in the practice of the acquisition of ownership of numerous bus carriers by non-carrier entities, it has consistently approved applications of this sort, finding that acquisitions that contemplate the single control of numerous passenger carriers can result in better overall service for the public without any lessening of the benefits of healthy competition. Its decisions include *National Express LLC – Acquisition of Control – Premier Transportation, LLC*; STB Docket No. MCF 21091 (served March 12, 2020); *Winthrop Sargent, John Cogliano, and Paul Fuerst – Acquisition of Control – Plymouth and Brockton Street Railway Company, Brush Hill Transportation Company, and McGinn Bus Company, Inc.*, STB Docket No. MCF 21089, (served January 3, 2020); *Transportation Demand Management Holdings, LLC – Acquisition of Control – Badger Bus Transportation Group, Inc.*, STB Docket No. MCF 21088 (served November 8, 2019); and *AAAH Regional Acquisition LLC – Acquisition of Control – First Class Tours, Inc. and Sierra Stage Coaches, Inc.*, STB Docket No. MCF 21087 (served November 1, 2019).

As previously mentioned, the primary transportation services provided by Easton are (i) the intrastate Paratransit and Shuttle Services under contracts with regional transportation authorities and other organizations, in eastern Pennsylvania and the state of New Jersey, and (ii) the Charter Coach Services, interstate and intrastate, also primarily in eastern Pennsylvania and the state of New Jersey (the “Service Area”), including coach and shuttle ground transportation services for passengers. Interstate charter services constitute

a relatively small portion of the transportation services provided by Easton. While the demand for interstate charter services in the Service Area, as well as nationwide, has been significantly reduced by the effects of the COVID-19 pandemic (the “COVID Situation”), it is anticipated that demand for such services will increase as the COVID Situation improves. Easton competes directly with other passenger charter and shuttle service providers in the Service Area, which is an extremely competitive market due to the significant number of national, regional and local charter providers operating within the Service Area. Other charter service providers in the Service Area include J&J Luxury Transportation, Hagey Coach & Tours, Martz Bus, Perkiomen Travel & Tours, and Trans-Bridge Lines. There are also a number of passenger transportation arrangers or brokers for charter services that operate within the Service Area. Additionally, all charter service providers, including Easton, compete with other modes of passenger transportation, including rail, low-cost airlines, and passenger transportation network companies.

The Service Area of Easton is geographically dispersed from the service areas of the Affiliate Regulated Carriers in regard to their respective service offerings, and there is virtually no overlap in the service areas and/or customer bases among the Affiliate Regulated Carriers and Easton in that regard. In light of the foregoing, it is clear that the impact of the Transaction on the regulated motor carrier industry will be minimal at most and that neither competition nor the public interest will be adversely affected.

Board approval of this Application will allow the acquisition of control of Easton to be accomplished without the approval of state regulatory authorities, thus relieving the parties

of the Transaction from potentially burdensome regulatory requirements. *See* 49 U.S.C. § 14303(f).⁶

VII. Safety Fitness Certification (49 C.F.R. § 1182.2(a)(8)).

Applicant and Seller hereby certify that the safety rating by the USDOT for each of the motor carriers involved in this Application is as set forth hereinabove and as summarized on Exhibit A.

VIII. Insurance Certification (49 C.F.R. § 1182.2(a)(9)).

Each of the motor carriers that is subject to FMCSA insurance requirements and is involved in this Application now satisfies and after Board approval of this Application will continue to satisfy FMCSA requirements relating to adequate security for the public. 49 U.S.C. § 13906. All of the FMCSA approved carriers have a minimum of \$5 million bodily injury and property damage insurance coverage on file with the FMCSA.

IX. Mexico Certification (49 C.F.R. § 1182.2(a)(10)).

A. Applicant. Applicant certifies that neither it nor any person controlling it is domiciled in Mexico, nor owned or controlled by persons of that country.

B. Easton. Seller certifies that Easton is neither domiciled in Mexico, nor owned or controlled by persons of that country.

X. No Individuals Holding Operating Authority (49 C.F.R. § 1182.2(a)(11)).

The Transaction does not involve the transfer of operating authority to an individual

⁶ 49 U.S.C. § 14303(f) provides that “A carrier or corporation participating in or resulting from a transaction approved by the [Surface Transportation] Board under this section, or exempted by the Board from the application of this section pursuant to section 13541, may carry out the transaction, own and operate property, and exercise control or franchises acquired through the transaction without the approval of a State authority. A carrier, corporation, or person participating in the approved or exempted transaction is exempt from the antitrust laws and from all other law, including State and municipal law, as necessary to let that person carry out the transaction, hold, maintain, and operate property, and exercise control or franchises acquired through the transaction.”

who will hold the authority in his or her name.

XI. Exempt Transaction under Federal Premerger Notification Laws.

Pursuant to 15 U.S.C. § 18a(c)(6), this Application and copies of all other information and documentary material filed with the Board in connection with the Transaction are being served upon the United States Federal Trade Commission and the Antitrust Division of the United States Department of Justice in keeping with the Transaction's status under the regulated-industry provisions of that statute.

XII. Conclusion.

Applicant submits that the Transaction is consistent with the public interest. As provided by 49 C.F.R. Part 1182 and for the reasons set forth herein, the Board is respectfully requested to approve this Application and authorize the Transaction and the acquisition of control of Easton as described herein.

XIII. Verification.

The verifications of Applicant and Seller are as follow:

[Remainder of Page Intentionally Blank – Verification and Signature Pages Follow]

A. Verification of Applicant. The undersigned verifies under penalty of perjury under the laws of the United States of America, that all information supplied by such person on behalf of and limited to Applicant in connection with this Application is true and correct. Further, the undersigned is qualified and authorized to submit this verification and file this Application. The undersigned further certifies under penalty of perjury under the laws of the United States, that she knows that willful misrepresentations or omissions of material facts constitute Federal criminal violations punishable under 18 U.S.C. § 1001 by imprisonment up to five years and fines up to \$10,000 for each offense. Additionally, these misstatements are punishable under 18 U.S.C. § 1621, which provides for fines up to \$2,000 or imprisonment up to five years for each offense.

“Applicant”

Van Pool Transportation LLC

Dated: June, 15, 2021

By: _____



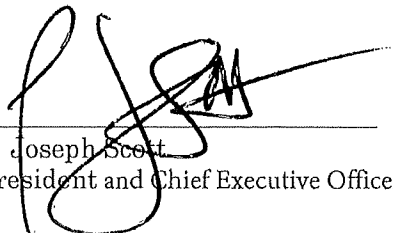
Judith Crawford
Chief Executive Officer

B. Verification of Seller. The undersigned verifies under penalty of perjury under the laws of the United States of America, that all information supplied by such person on behalf of and limited to Seller and Easton, as applicable, in connection with this Application is true and correct. Further, the undersigned is qualified and authorized to submit this verification and authorize the filing of this Application. The undersigned further certifies under penalty of perjury under the laws of the United States, that he knows that willful misrepresentations or omissions of material facts constitute Federal criminal violations punishable under 18 U.S.C. § 1001 by imprisonment up to five years and fines up to \$10,000 for each offense. Additionally, these misstatements are punishable under 18 U.S.C. § 1621, which provides for fines up to \$2,000 or imprisonment up to five years for each offense.

"Seller"

ECC Holding Company, Inc.

Dated: June 15, 2021

By: 

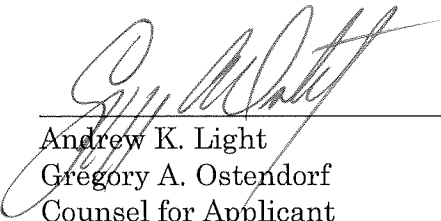
P. Joseph Scott
President and Chief Executive Officer

XIV. Applicant Legal Counsel.

“Applicant”

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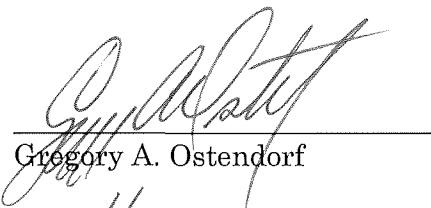
Respectfully,



Andrew K. Light
Gregory A. Ostendorf
Counsel for Applicant

Certificate of Service

I hereby certify that as required by 49 C.F.R. § 1182.3, I have served a copy of the foregoing Application by mailing a copy thereof, via U.S. first-class mail on the U.S. Department of Transportation, Chief Licensing and Insurance Division, 1200 New Jersey Avenue, S.E., Mail Stop W65-331, Washington, DC 20590; and the state regulatory agency for the states in which intrastate operations are affected. I further certify that as required by 15 U.S.C. § 18a(c)(6), I have also served a copy of the foregoing Application, and copies of all other information and documentary material filed with the Surface Transportation Board in connection with the Transaction, via email on the United States Federal Trade Commission and the Antitrust Division of the United States Department of Justice.



Gregory A. Ostendorf
June 16, 2021

<u>Exhibit A</u>			
<u>Entity Names</u>	<u>USDOT No.</u>	<u>FMCSA Docket No.</u>	<u>USDOT Safety Rating</u>
Van Pool Transportation LLC (Applicant)	None	None	None
NRT Bus Inc. (NRT)	1166825	MC-595581	Satisfactory
Trombly Motor Coach Service Inc. (Trombly)	106905	MC-116313	Satisfactory
Salter Transportation, Inc. (Salter)	2446427	MC-190881	Satisfactory
ECC Holding Company, Inc. (Seller)	None	None	None
Easton Coach Company, LLC (Easton)	1020738	MC-430400	Satisfactory

Exhibit B

Attached

