

ENTERED
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August 25, 2025
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Public Record

BEFORE THE
SURFACE TRANSPORTATION BOARD

IN THE MATTER OF

TBL GROUP, INC.

-- ACQUISITION OF CONTROL --

BTM COACHES, INC.

DOCKET NO. MCF 21138

VERIFIED APPLICATION UNDER 49 U.S.C. § 14303(a) OF TBL GROUP, INC.
FOR APPROVAL OF THE ACQUISITION OF CONTROL OF
BTM COACHES, INC.

TBL Group, Inc. ("Applicant") respectfully submits this application under 49 U.S.C. § 14303 and Surface Transportation Board ("STB" or "Board") regulations at 49 C.F.R. Part 1182 (this "Application") for approval of the transaction more fully described herein ("Contemplated Transaction"). The Contemplated Transaction entails the direct acquisition of control by Applicant of the regulated interstate and intrastate passenger motor carrier, BTM Coaches, Inc. ("Coaches"), from its sole shareholder, William A. Moberg ("Seller").

I. Parties of the Contemplated 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 Texas corporation, headquartered at 15734 Aldine Westfield Road, Houston, Texas 77032. The authorized signature on behalf of Applicant is set forth in the Verification of Applicant in Section XIII of this Application.

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).

Applicant is not a federally-regulated carrier, and does not have a U.S. Department of Transportation Number (“USDOT No.”), Federal Motor Carrier Safety Administration Docket Number (“FMCSA Docket No.”),² or a safety rating assigned by U.S. Department of Transportation (“Safety Rating”).³ However, Applicant controls ten (10) other affiliated entities (“Applicant’s Affiliates”).

B. Applicant’s Affiliates. Applicant’s Affiliates are:

1. Echo Nevada, LLC (“Echo Nevada”);
2. GBJ, Inc. (“GBJ”);
3. Republic Equipment Works, LLC (“Republic”);
4. ATT & Traffic Management, LLC (“ATT”);
5. ET&C GP, LLC (“ET&C”);
6. Echo Tours & Charters, LP (“Echo Tours”);
7. Echo East Coast Transportation LLC (“Echo East”);
8. Echo Windy City, LLC (“Echo Windy”);
9. EWC Team, LLC (“EWC”); and
10. Reston Limousine & Travel Service, Inc. (“Reston”).

C. Affiliated Regulated Carriers. Among Applicant’s Affiliates are five (5) interstate passenger motor carriers (the “Affiliated Regulated Carriers”):

1. GBJ. GBJ is a Texas corporation doing business as “Echo AFC Transportation,” “AFC Transportation,” and “Echo AFC Medical Transport,” primarily providing charter and contract shuttle services for companies, non-profits,

² An FMCSA Docket No. is the reference number assigned to a motor carrier by the Federal Motor Carrier Safety Administration for interstate motor carrier authority.

³ Certain of the motor carriers have not been rated by FMCSA or USDOT. If a carrier has not been rated, the Safety Rating is denoted as None.

schools, and tour operators. The business address, along with USDOT Number, FMCSA Docket No. and Safety Rating assigned to GBJ, are set forth on the Summary Table attached hereto as Exhibit A (the “Summary Table”). The geographic service area of GBJ is primarily within the metropolitan area of Houston, Texas, but it also provides interstate charter passenger transportation service. The approximate number and types of vehicles utilized by GBJ, as well as its approximate number of drivers,⁴ are also set forth on the Summary Table. GBJ also holds intrastate passenger authority in the state of Texas under certificate no. 005959762C.

2. Echo Tours. Echo Tours is a Texas limited partnership doing business as “Echo Transportation,” primarily providing charter and contract shuttle services for companies, non-profits, schools, and tour operators. The business address, along with USDOT Number, FMCSA Docket No. and Safety Rating assigned to Echo Tours are set forth on the Summary Table. The geographic service area of Echo Tours is primarily the metropolitan area of Dallas, Texas, but it also provides interstate charter passenger transportation service. The approximate number and types of vehicles utilized by Echo Tours, and its approximate number of drivers, are set forth on the Summary Table. Echo Tours also holds intrastate passenger authority in the state of Texas under certificate no. 006620250C. Echo Tours is wholly owned by ET&C (described below).

⁴ The numbers of vehicles and drivers reflected in the Company Snapshot of the Federal Motor Carrier Safety Administration’s Safety and Fitness Electronic Records (SAFER) System is dependent on information submitted by the applicable motor carriers on form MCS-150 (Motor Carrier Identification Report), which is required to be categorically updated biennially and only required to reflect vehicles subject to Uniform Carrier Registration; however, carriers can include intrastate vehicles and drivers that are not required to be included. Accordingly, the number of vehicles and drivers reflected in the Company Snapshot may not be the same as the number of vehicles and drivers in use by a carrier at a given point in time. Additionally, the numbers of vehicles and drivers for a carrier will fluctuate from time to time.

3. Echo East. Echo East is a Texas limited liability company doing business as “Echo East Coast Transportation,” primarily providing passenger contract shuttle and charter vehicle services. The business address, along with USDOT Number, FMCSA Docket No. and Safety Rating assigned to Echo East, are set forth on the Summary Table. The geographic service area of Echo East is primarily the metropolitan area of Jacksonville, Florida, and its primary service offerings are interstate and intrastate contract and charter motor carrier passenger service. The approximate number and types of vehicles utilized by Echo East, as well as its approximate number of drivers, are set forth on the Summary Table. While Echo East is controlled by Applicant, Mike Sobol, an employee of Echo East, holds a minority membership interest (14%) in Echo East. Echo East also holds intrastate passenger authority in the state of Texas under certificate no. 009946405C (although such authority is not necessary based on its current operations).

4. Echo Windy. Echo Windy is a Texas limited liability company, doing business as “Echo Windy City Transportation.” The business address, along with USDOT Number, FMCSA Docket No. and Safety Rating assigned to Echo Windy are set forth on the Summary Table. The approximate number and types of vehicles utilized by Echo East, as well as its approximate number of drivers, are set forth on the Summary Table. The geographic service area of Echo Windy is primarily the metropolitan area of Chicago, Illinois, and its primary service offering is intrastate limousine and charter passenger service. No intrastate passenger motor carrier authority is required in the state of Illinois. Echo Windy can also provide interstate passenger limousine and charter passenger services. While Echo Windy is controlled

by Applicant, employees George Jacobs and Kathleen Kahne hold minority membership interests (14.77% and 1.97%, respectively) in Echo Windy.

5. Reston. Reston is a Virginia corporation. The business address, along with USDOT Number, FMCSA Docket No. and Safety Rating assigned to Reston are set forth on the Summary Table. Reston provides limousine, shuttle, and charter passenger service, interstate and intrastate, in the metropolitan area of Washington D.C. The approximate number and types of vehicles utilized by Reston, and its approximate number of drivers, are set forth on the Summary Table. Reston also holds intrastate passenger carrier authorities issued by the Maryland Public Service Commission, the Virginia Department of Motor Vehicles, and the Washington Metropolitan Area Transit Commission.

D. Unregulated Affiliates. Other than the Affiliated Regulated Carriers described above, the remainder of Applicant's Affiliates (the "Unregulated Affiliates") do not hold and their respective operations do not require interstate passenger motor carrier authority. The Unregulated Affiliates are:

1. Echo Nevada. Echo Nevada is a Nevada limited liability company that currently has no operations and is not a motor carrier of passengers.

2. Republic. Republic is a Texas limited liability company doing business as "Echo Transportation Solutions" and "Republic Fleet Services," and is headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. Republic provides maintenance and repair services to owners and/or operators of heavy trucks and buses in the metropolitan areas of Houston and Dallas, Texas. Republic is a direct subsidiary of Applicant and is not a motor carrier of passengers.

3. ATT. ATT is a Texas limited liability company doing business as “American Transfers & Tours” and “American Traffic Management,” and is headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. ATT provides transportation planning for individuals and groups at or in conjunction with activities such as conventions, sporting events, tours, and other organized gatherings. The geographic area serviced by ATT is primarily the state of Texas. ATT is a direct subsidiary of Republic and thus an indirect subsidiary of Applicant. ATT is not a passenger motor carrier.

4. ET&C. ET&C is a Texas limited liability company that serves as an intermediate holding company of all the partnership interests in Echo Tours and is wholly owned by Applicant. ET&C is headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. ET&C is a direct subsidiary of Applicant. ET&C is not a motor carrier of passengers and has no other purpose or operation other than serving as an intermediate holding company.

5. EWC. EWC is a Texas limited liability company headquartered at 15734 Aldine Westfield Rd., in Houston, Texas. EWC is a small administrative services provider and is not a motor carrier of passengers.

E. Seller. Seller owns and controls 100% of the equity stock of Coaches. Seller is a resident of the state of Florida. Seller does not have any direct or indirect ownership interest in any interstate passenger motor carrier other than Coaches, and Seller is not a passenger motor carrier. The authorized signature on behalf of Seller is set forth in the Verification of Applicant in Section XIII of this Application.

F. Coaches. Coaches is a Florida corporation with its primary place of business at 1445 Cox Road, Cocoa, Florida. Coaches was founded in 2017 and operates as a motor carrier

of passengers primarily providing general charter motor coach and contract bus services to schools/universities, companies, organizations, and groups of individuals, for activities such as tours, to/from airport, weddings, athletics, recreation/entertainment, and other activities favoring group transportation. Coaches also provides a limited amount of student home to school transportation in the area of Cocoa, Florida. Coaches' primary service area is East Central Florida (being the area around Daytona Beach and south to the area around Vero Beach), including Orlando and the various theme parks and resorts, and the cruise terminals at Port Canaveral (the "Coaches Service Area"). In addition to its headquarters in Cocoa, Coaches also maintains service locations in Daytona Beach and Vero Beach. The USDOT Number assigned to Coaches is 3077114. For purposes of its interstate passenger operations, Coaches holds interstate carrier operating authority under FMCSA Docket No. MC-64539, and Coaches has a "Satisfactory" Safety Rating. In providing its services, Coaches utilizes approximately 40 – motor coaches, 11 – mini-buses, and 9 – school buses, and has approximately 102 drivers. No authority from the state of Florida is required for the operations of Coaches.

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

The event triggering STB jurisdiction is the Contemplated Transaction through which Applicant will acquire all the issued and outstanding equity stock interest of Coaches, the effect of which will be to place Coaches under the control of Applicant. As such, STB's jurisdiction is invoked by 49 U.S.C. § 14303(a)(5), as the Contemplated Transaction involves "acquisition of control of a carrier [*i.e.*, Coaches] by a person that is not a carrier but that controls any number of carriers [*i.e.*, Applicant]." We note that 49 U.S.C. § 14303(f) states "a carrier or a corporation participating in or resulting from a transaction approved by the Board under this Section 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.” Thus, the granting of this Application by the Board will avoid any potential need for state or local approval.

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

Other than the Affiliated Regulated Carriers and Coaches as described above, there are no other carriers with regulated interstate operations involved in this Application. The Contemplated Transaction will result in Coaches being acquired, owned and controlled by Applicant. The intercorporate structure of Applicant is as follows:

All of the outstanding equity stock of Applicant is owned, held and controlled by John V. Ferrari (50%) and Sonny El-Lahham (50%) (collectively, the “Shareholders”). Both Shareholders are individual U.S. citizens and residents of the state of Texas. Neither Shareholder controls any interstate passenger motor carriers other than those described in this Application. A chart depicting the intercorporate structure of Applicant is set forth on Exhibit B attached hereto. Neither Shareholder has interstate passenger motor carrier authority, a USDOT Number, nor a USDOT Safety Rating. Additionally, none of the aforementioned persons or entities control 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 Coaches exceed \$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 Contemplated Transaction will not have a significant effect on the quality of the human environment and the conservation

of energy resources. The Contemplated Transaction is merely a change in control of a carrier that already provides diverse passenger transportation services. No significant operational changes are anticipated at the current time and, therefore, 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 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 Contemplated Transaction is not expected to have any detrimental impact on the adequacy of transportation services available for the public in the Coaches Service Area. Applicant anticipates that services available to the public will be improved as operating efficiencies are realized and additional services and capacity are made available. For at least the foreseeable future, the services currently provided by Coaches will continue to be provided by Coaches under the same name used to provide such services prior to the Contemplated Transaction. The addition of Coaches 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 service markets, but in different geographic areas. The Contemplated Transaction will bring Coaches under the control of Applicant, which is experienced in the same market segments served by Coaches,

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.

being charter transportation and contract shuttle services. Such market segments have their own service characteristics, and the Contemplated 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's Affiliates, all of which will help to ensure the provision of adequate service to the public.

The addition of Coaches to Applicant will serve to enhance the viability of the Applicant's organization and the Applicant's Affiliates. The continued viability of Applicant and the Applicant's Affiliates assures the continued availability of adequate passenger transportation service for the public in the areas served by the Applicant's Affiliates.

B. Fixed Charges. The Contemplated Transaction will increase fixed charges, in the form of interest expense, because funds will be borrowed to assist in the financing of the Contemplated Transaction. However, such an increase will not impact the provision of transportation services to the public.⁶

C. Employee Interests. It is the current intention of Applicant to continue the existing operations of Coaches and as such, the Contemplated Transaction is not expected have substantial impacts on employees or labor conditions. Applicant does not expect or contemplate a measurable reduction in force or changes in compensation levels and/or benefits, although staffing redundancies could potentially result in limited downsizing of back-office and/or managerial level personnel. It is contemplated that Seller will remain as an officer of Coaches after the closing of the Contemplated Transaction.

⁶ 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.

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 the 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 because 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 *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).

The demand for charter transportation and contract shuttle in the Coaches Service Area is strong and is expected to remain strong in the foreseeable future due to the expending population in the area, and the continued existence and growth of the entertainment and cruise providers in the area. Coaches competes directly with other passenger service providers in the Coaches Service Area, which is a very competitive market due to the significant number of national, regional and local providers operating within the Coaches Service Area, including, without limitation, Academy Bus, Inc., Lamers Bus Lines, Motor Coach Class A Transportation Inc., Escot Bus Lines, Empire Coach Line, Inc., and Mears Transportation, LLC. Additionally, there are a number of charter bus brokerage providers, such as GoGo Charters, National Charter Bus, and CharterUp. Passenger motor coach charter providers, particularly in the area near Orlando, are also in direct competition for certain destinations served by *Brightline* (scheduled high-speed rail transportation between Orlando and Miami), and a number of scheduled airlines.

The Coaches Service Area is geographically dispersed from service areas of the Affiliated Regulated Carriers, excluding Echo East (see discussion below), in regard to their service offerings, and there is no material overlap in customer bases among the Affiliated Regulated Carriers and Coaches in that regard. The service area of Echo East is the area around Jacksonville, FL (the “Echo East Service Area”). There is some overlap as between the Coaches Service Area and the Echo East Service Area; however, Echo East is a significantly smaller carrier (35 passenger vehicles and 35 drivers) than Coaches (60 passenger vehicles and 102 drivers). Coaches provides limited home to school services, while home to school services are not among the service offerings of Echo East. It is estimated that each Echo East and Coaches generate less than 5% of their respective revenues from the overlap of their service areas, and each has a respective niche. The mix of services generating

the majority of revenue for Echo East leans more to contract shuttle services for commercial, hotel, and resort customers utilizing smaller vehicles and shorter moves in most of its services. The mix of services generating the majority of revenue for Coaches on the other hand leans more to traditional motor coach charter services for universities/schools, cruise lines, and general commercial customers, generally for larger groups of passengers utilizing larger motor coaches and involving longer trips and/or longer periods of time.

As mentioned above, Mr. Moberg, the Seller, is expected to remain with Coaches as President after the closing of the Contemplated Transaction, and the operations of Coaches are expected to continue without change or interruption after the closing of the Contemplated Transaction. In light of the foregoing, it is clear the impact of the Contemplated 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 Coaches to be accomplished without the approval of state regulatory authorities, thus relieving the parties of the Contemplated Transaction from potentially burdensome regulatory requirements. See 49 U.S.C. § 14303(f).⁷

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

Applicant certifies that the Safety Rating (if any) for each of the Affiliated Regulated Carriers is as set forth on the Summary Table. Seller certifies that the Safety Rating of

⁷ 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.”

Coaches is as set forth hereinabove.

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

Seller certifies that Coaches currently has the requisite insurance coverage under 49 U.S.C. § 13906. Applicant certifies that Coaches immediately following the closing of the Contemplated Transaction will continue to have the requisite insurance coverage under 49 U.S.C. § 13906.

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

A. Applicant. Applicant certifies that neither it nor any of the Affiliated Regulated Carriers are domiciled in Mexico, nor are any of such entities owned or controlled by persons of that country.

B. Coaches. Seller certifies that Coaches 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 Contemplated Transaction does not involve the transfer of operating authority to an individual 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 Contemplated Transaction are being filed with the United States Federal Trade Commission and the Antitrust Division of the United States Department of Justice in keeping with the Contemplated Transaction's status under the regulated-industry provisions of that statute.

XII. Conclusion.

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 Contemplated

Transaction and acquisition of control as described herein.

XIII. Verification.

The verifications of Applicant and Seller are as follow:

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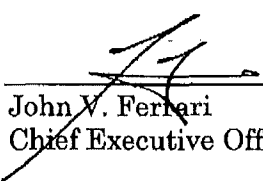
VERIFICATION

I, John V. Ferrari, Chief Executive Officer of Applicant, verify under penalty of perjury, under the laws of the United States of America, that all information supplied in connection with this Application relative to Applicant is true and correct. Further, I certify that I am qualified and authorized to file this application or pleading. I know that willful misstatements 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 as perjury under 18 U.S.C. § 1621, which provides for fines up to \$2,000 or imprisonment up to five years for each offense.

"Applicant"

TBL Group, Inc.

Dated: August 25, 2025

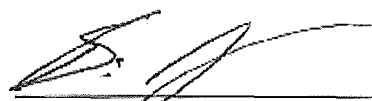
By: 
John V. Ferrari
Chief Executive Officer

VERIFICATION

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 Coaches and Seller in connection with this Application is true and correct. Further, the undersigned with respect to Coaches and Seller, respectively, is qualified and authorized on behalf of Coaches and Seller, respectively, to submit this verification and file this Application. The undersigned further certifies under penalty of perjury under the laws of the United States, 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”

Dated: August 25, 2025



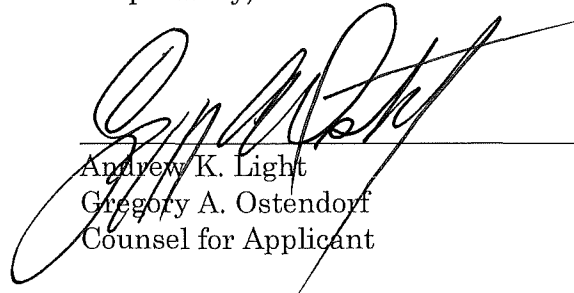
William H. Moberg

XIV. Applicant Legal Counsel.

“Applicant”

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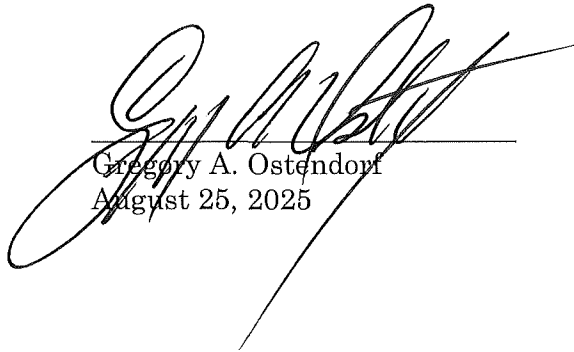
Respectfully,



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 Contemplated Transaction, via email on the United States Federal Trade Commission and the Antitrust Division of the United States Department of Justice.



Gregory A. Ostendorf
August 25, 2025

Exhibit A
Summary Table

<u>Entity Names</u>	<u>USDOT No.</u>	<u>FMCSA Docket No.</u>	<u>USDOT Safety Rating</u>	<u>Vehicles and Drivers</u>
GBJ Inc. 15734 Aldine Westfield Rd., Houston, TX 77032	835782	MC-369531	Satisfactory	Motor Coach – 37 School Bus – 8 Mini-Bus – 23 Drivers – 68
Echo East Coast Transportation LLC 1712 Ogilvie Park Ln. Jacksonville, FL 32246	4148029	MC-1591798	Satisfactory	Motor Coach – 9 Mini-Bus – 15 Van – 11 Drivers – 32
Echo Tours & Charters, LP 1505 Skyline Rd., Dallas, TX 75051	2172280	MC-755212	Satisfactory	Motor Coach – 46 Mini-Bus – 28 Drivers – 100
Echo Windy City, LLC 2801 S. 25th Avenue, Broadview, IL 60155	4157925	MC-1597383	None	Motor Coach – 41 Mini-Bus – 33 Van – 12 Drivers – 134
Reston Limousine & Travel Service, Inc. 45685 Elmwood Ct. Sterling, VA 20166	561180	MC-273787	Satisfactory	Motor Coach – 21 Mini-Bus – 115 Van – 40 Drivers – 174

Exhibit B

[See Attached]

TBL Group, Inc.
Structure Chart

