



GARVIN LIGHT HANSON & FEARY

10 West Market Street
Suite 1500
Indianapolis, IN 46204

The full service transportation law firm

www.scopelitis.com

Main (317) 637-1777
Fax (317) 687-2414

ANDREW K. LIGHT
alight@scopelitis.com

September 5, 2012

Via Electronic Filing

232929

Ms. Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

ENTERED
Office of Proceedings
September 5, 2012
Part of
Public Record

Re: MC-F 21047; Frank Sherman, FSCS Corporation, TMS
West Coast, Inc., Evergreen Trails, Inc., and Cabana
Coaches, LLC – Acquisition and Consolidation of Assets –
American Charters Ltd., et al.

Dear Ms. Brown:

Our firm represents America Charters, Ltd., American Coach Lines of Jacksonville, Inc., American Coach Lines of Miami, Inc., American Coach Lines of Orlando, Inc., CUSA ASL, LLC, CUSA BCCAE, LLC, CUSA CC, LLC, CUSA FL, LLC, CUSA GCBS, LLC, CUSA GCT, LLC, CUSA K-TCS, LLC, and Midnight Sun Tours, Inc., referenced as the “Coach America Subsidiaries” in the application that initiated the above-captioned matter (the “Application”), filed on June 4, 2012. ***For reasons set forth below, this is a matter of extreme urgency as severe disruption of public transportation is imminent.***

On August 20, 2012, Frank Sherman, FSCS Corporation, TMS West Coast, Inc., Evergreen Trails, Inc., and Cabana Coaches, LLC (the “Applicants”) filed with the Board their Request for an Expedited Decision in this matter (the “Request”). I write, on behalf of the Coach America Subsidiaries, in support of the Request. We urge immediate action by the Board in order to the imminent disruption of public transportation.

Pursuant to the Application, the Applicants seek approval of the Board to acquire substantially all of the assets of the Coach America Subsidiaries (the “Contemplated Transaction”). As is set forth in the Application, the Coach American Subsidiaries are debtors in a jointly administered bankruptcy case pending in the U.S. Bankruptcy Court for the District of Delaware, and that Bankruptcy Court has approved the Contemplated Transaction.

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As is set forth in the Request, August 17, 2012, was the last day upon which comments to the Application could be filed. Two (2) comments were filed with respect to the Application: (a) a comment filed by Michael Yusim on June 7, 2012, to which the Applicants filed a reply on June 11, 2012; and (b) a comment filed on June 19, 2012, by the Ventura County Transportation Commission, which comment was voluntarily dismissed on July 2, 2012. Accordingly, the matter is ripe for decision.

The Coach America Subsidiaries currently operate over one thousand passenger transportation vehicles and serve the transportation needs of approximately 90,000 commuters and passengers daily with regular route services and charter services in over 50 cities located in the following states: Arizona, California, Colorado, Florida, Nevada, North Carolina and Texas. The liability insurance of the Coach America Subsidiaries that is required to continue their passenger transportation services will expire at 12:01 a.m. on Sunday, September 16, 2012.

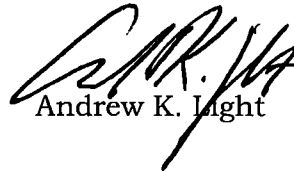
By design, the Contemplated Transaction is intended to provide a seamless transition of the current operations of the Coach America Subsidiaries to the operations of the Applicants; however, lacking liability insurance and a failure to close the Contemplated Transaction, the operations of the Coach America Subsidiaries will be required to cease on Saturday, September 15, 2012. Due to the size, nature and terms of the Contemplated Transaction, a minimum of three (3) business days is required after the entry of the Board's decision in this matter within which to complete and close the Contemplated Transaction. Not only do the Applicants need time to transition the business operations from the Coach America Subsidiaries to the Applicants, the Applicants also need time to consummate their financing transaction, arrange for their intrastate authorities and attend to all of the other closing logistics that can only be undertaken after the Board's decision has been rendered. In order to close the Contemplated Transaction by next Friday, September 14, 2012 (the last business day before the expiration of the Coach America Subsidiaries' liability insurance), we submit that the Board's decision needs to be rendered by this Friday, September 7, 2012.

If the Board's decision in this matter is not rendered this week, the Coach America Subsidiaries will be in real and significant danger of being forced to cease passenger transportation operations, which will have the effects of eliminating the availability of passenger vehicle transportation for thousands of commuters and passengers, and substantially disrupting what are currently established transportation networks utilized by the public for transportation for work, school, medical needs and pleasure. Accordingly, in requesting an immediate issuance of a decision, we support the Request filed by the Applicants.

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Please contact me as soon as possible if you have any questions.

Very truly yours,



Andrew K. Light

cc: Mr. David H. Coburn
Steptoe & Johnson LLP
1330 Connecticut Ave., N.W.
Washington, DC 20036-1795

Mr. Mitchel B. Kahn
Nelson Comis Kahn & Sepulveda LLP
300 Esplanade Drive, Suite 1170
Oxnard, CA 93036

Yusim, Michael
7499 Eagle Point Drive
Delray Beach, FL 33446

Ms. Laura Hendricks, CEO
Coach America
8150 N. Central Expressway
Suite M1000
Dallas, TX 75206

Mr. Steven E. Siesser
Lowenstein Sandler PC
1251 Avenue of the Americas
New York, NY 10020