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SURFACE
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LAW OFFICES
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EIGHTH FLOOR
1920 N STREET, N.W.
WASHINGTON, D.C. 20036-1601

(202) 263-4152
FAX (202) 331-8330
e-mail: xicgc@worldnet.att.net

ORIGINAL

206080

DID# 010216001

August 21, 2002

VIA HAND DELIVERY - RETURN COPY

Hon. Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, NW (7th fl.)
Washington, DC 20423-0001

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Office of Proceedings

AUG 21 2002

Part of
Public Record



Dear Secretary Williams:

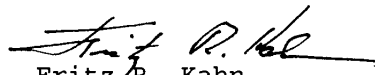
Enclosed for filing in STB Docket No. MC-F-20991, Greyhound Lines, Inc., and Laidlaw Inc--Continuance in Control--Crucero U.S.A., L.L.C., are the original and ten copies of the Verified Application of Greyhound Lines, Inc., and Laidlaw Inc.

This firm's check for \$1,500.00 in payment of the filing fee is attached.

Additional copies of this letter and of the Application are enclosed for you to stamp to acknowledge your receipt of them and to return to me via the messenger.

If you have any question concerning the foregoing which you believe I may be able to answer or if I otherwise can be of assistance, please let me know.

Sincerely yours,


Fritz R. Kahn

enc.

cc: Mark E. Southerst, Esq.
Susannah Riggs, Esq.

FILED

SURFACE
TRANSPORTATION BOARD

BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, D.C.

ORIGINAL

206080

STB Docket No. MC-F-20991

GREYHOUND LINES, INC.,
and LAIDLAW INC.

-- CONTINUANCE IN CONTROL --
CRUCERO U.S.A., L.L.C.



VERIFIED APPLICATION
OF
GREYHOUND LINES, INC.,
and LAIDLAW INC

ENTERED
Office of Proceedings

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Public Record

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SURFACE
TRANSPORTATION BOARD

Mark E. Southerst
Vice President and General Counsel
Greyhound Lines, Inc.
P. O. Box 660362
Dallas, TX 75266-0362
Tel.: (972) 789-7415

Ivan Cairns
Sr. Vice President and General Counsel
Laidlaw Inc.
P. O. box 5026
Burlington, ON, Canada L7R 3Y8

Fritz R. Kahn
Fritz R. Kahn, P.C.
1920 N Street, NW (8th fl.)
Washington, DC 20036-1601
Tel.: (202) 263-4152

Attorneys for

GREYHOUND LINES, INC.
and LAIDLAW INC.

Dated: August 21, 2002

BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, D.C.



STB Docket No. MC-F-20991

GREYHOUND LINES, INC.,
and LAIDLAW INC.
-- CONTINUANCE IN CONTROL --
CRUCERO U.S.A., L.L.C.

VERIFIED APPLICATION
OF
GREYHOUND LINES, INC.,
and LAIDLAW INC

Applicant, Greyhound Lines, Inc, of Dallas, TX
("Greyhound"), and Laidlaw Inc. of Burlington, ON ("Laidlaw"),
pursuant to 49 U.S.C. 14303 and 49 C.F.R. 1182.1, et seq., seek
Board approval to continue in indirect control of Crucero,
U.S.A., L.L.C., upon its becoming registered as a motor carrier
of passengers, and in support thereof Applicants state, as
follows:

1. Name, addresses and telephone numbers of parties:

Applicants are:

Greyhound Lines, Inc.
P. O. Box 660362
Dallas, TX 75266-0362
Tel.: (972) 789-7415

Laidlaw Inc.
P. O. Box 5026
Burlington, ON, Canada L7R 3Y8
Tel.: (905) 336-1800

The company indirectly controlled by Applicants which will control Crucero U.S.A., L.L.C., is:

Sistema Internacional de Transporte
de Autobuses, Inc.
802 Commerce Street (3rd fl.)
Dallas, TX 75202
Tel.: (214) 849-8615

The company indirectly controlled by Applicants which seeks to become a motor carrier of passengers is:

Crucero U.S.A., L.L.C.
802 Commerce Street (3rd fl.)
Dallas, TX 75201
Tel.: 214) 849-8615

2. Descriptions of pertinent operating authorities:

Greyhound, is a motor carrier of passengers providing scheduled, regular-route operations throughout the U.S., pursuant to authority granted in Docket No. MC-1515.

Greyhound controls eight motor carriers of passengers, five via its wholly-owned noncarrier subsidiary, GLI Holding Company, namely, Rockford Coach Lines, L.L.C. (formerly Peoria Rockford Bus Lines, L.L.C.),, a regional passenger carrier operating in Illinois, pursuant to authority granted in Docket No. MC-66810, Valley Transit Co., Inc., a regional passenger carrier operating in Texas, pursuant to authority granted in Docket No. MC-74, Carolina Coach Company, a regional passenger carrier operating in Delaware, Maryland, North Carolina, Pennsylvania and Virginia, pursuant to authority granted in Docket No. MC-13300, Texas, New Mexico & Oklahoma Coaches, Inc., a regional passenger carrier operating in the Colorado, Kansas, New Mexico, Oklahoma and Texas area, pursuant to authority

granted in Docket No. MC-61120 and Vermont Transit Co., Inc., a regional passenger carrier operating in the Maine, Massachusetts, New Hampshire, New York and Vermont area, pursuant to authority granted in Docket No. MC-45626, and three via its noncarrier subsidiary, Sistema Internacional de Transporte de Autobuses, Inc., namely, Americanos U.S.A., L.L.C., a regional passenger carrier with authority to conduct operations between Mexican border crossing points at El Paso, TX, Laredo, TX, and McAllen, TX, on the one hand, and, on the other, Albuquerque, NM, Denver, CO, Dallas, TX, Houston, TX, and Chicago, IL, and between other points in the southwestern U.S., pursuant to authority granted in Docket No. MC-309813, Autobuses Amigos, L.L.C., a passenger carrier with authority to operate between Mexican border crossing points at Brownsville, TX, and Houston, TX, and points in the southeastern U.S., pursuant to authority granted in Docket No. MC-340462, and Gonzalez, Inc., d/b/a Golden State Transportation, a scheduled, regular-route regional passenger carrier operating principally in the States of Arizona, California, Colorado and Nevada, pursuant to authority granted in Docket No. MC-173837.

Crucero U.S.A., L.L.C., holds no authority to operate as a motor carrier of passengers but has filed an Application for Motor Passenger Carrier Operating Authority, Form OP-1(P), with the Federal Motor Carrier Safety Administration of the U. S. Department of Transportation to register as a motor carrier of passengers rendering scheduled, regular-route service in California and Arizona.

3. A description of the proposed transaction:

Crucero U.S.A., L.L.C., a company indirectly controlled by Applicants though their noncarrier subsidiary, Sistema Internacional de Transporte de Autobuses, Inc., has filed an Application for Motor Passenger Carrier Operating Authority, Form OP-1(P), to be registered as a motor carrier of passengers rendering scheduled, regular-route operations in California and Arizona. Applicants directly and indirectly control several motor carriers of passengers, and, therefore, Applicants require Board authorization, pursuant to 49 U.S.C. 14303, to continue in indirect control of Crucero U.S.A., L.L.C., upon its becoming registered as a motor carrier of passengers.

4. Affiliated motor passenger carriers, their operations and relationships:

Greyhound is an indirect subsidiary of Laidlaw Inc.

Laidlaw Inc. controls Laidlaw Transit Ltd., a motor carrier of passengers rendering special and charter operations in the U.S. pursuant to authority granted in Docket No. MC-102189, and it, in turn, controls several motor carriers of passengers rendering special and charter operations in the U.S., pursuant to authorities granted as shown on the attached charts of Organization of Laidlaw Motor Carrier Subsidiaries and FMCSA Registered Motor Carrier Affiliates.

Laidlaw Inc., also, controls Greyhound Canada Transportation Corp., a motor carrier of passengers rendering special and charter operations in the U.S., pursuant to authority

granted in Docket No. MC-304126, and it, in turn, controls Voyageur Corp., a motor carrier of passengers rendering special and charter operations in the U.S., pursuant to authority granted in Docket No. MC-360339.

Laidlaw Inc., finally, controls Laidlaw Investments, Ltd., a noncarrier, which, in turn, controls Laidlaw Transportation, Inc., a noncarrier, which in turn controls several motor carriers of passengers rendering special and charter operations in the U.S., pursuant to authorities granted as shown on the attached charts of Organization of Laidlaw Motor Carrier Subsidiaries and FMCSA Registered Motor Carrier Affiliates, and Greyhound.

Greyhound is a motor carrier of passengers providing scheduled, regular-route operations throughout the U.S., pursuant to authority granted in Docket No. MC-1515.

Greyhound controls eight motor carriers of passengers; five via its wholly-owned noncarrier subsidiary, GLI Holding Company, namely, Rockford Coach Lines, L.L.C. (formerly Peoria Rockford Bus Lines, L.L.C.), a regional passenger carrier operating in Illinois, pursuant to authority granted in Docket No. MC-66810, Valley Transit Co., Inc., a regional passenger carrier operating in Texas, pursuant to authority granted in Docket No. MC-74, Carolina Coach Company, a regional passenger carrier operating in Delaware, Maryland, North Carolina, Pennsylvania and Virginia, pursuant to authority granted in Docket No. MC-13300, Texas, New Mexico & Oklahoma Coaches, Inc.,

a regional passenger carrier operating in the Colorado, Kansas, New Mexico, Oklahoma and Texas area, pursuant to authority granted in Docket No. MC-61120 and Vermont Transit Co., Inc., a regional passenger carrier operating in the Maine, Massachusetts, New Hampshire, New York and Vermont area, pursuant to authority granted in Docket No. MC-45626, and three via its noncarrier subsidiary, Sistema Internacional de Transporte de Autobuses, Inc., namely, Americanos U.S.A., L.L.C., a regional passenger carrier with authority to conduct operations between Mexican border crossing points at El Paso, TX, Laredo, TX, and McAllen, TX, on the one hand, and, on the other, Albuquerque, NM, Denver, CO, Dallas, TX, Houston, TX, and Chicago, IL, and between other points in the southwestern U.S., pursuant to authority granted in Docket No. MC-309813, Autobuses Amigos, L.L.C., a passenger carrier authorized to operate between Mexican border crossing points at Brownsville, TX, and Houston, TX, and points in the southeastern U.S., pursuant to authority granted in Docket No. MC-340462, and Gonzalez, Inc., d/b/a Golden State Transportation, a scheduled, regular-route regional passenger carrier operating principally in the States of Arizona, California, Colorado and Nevada, pursuant to authority granted in Docket No. MC-173837.

The attached chart of Organization of Laidlaw Motor Carrier Subsidiaries shows the intercorporate structure of the corporate family from top to bottom.

5. Jurisdictional statement:

Applicants' aggregate gross operating revenues for the

preceding twelve months exceeded \$2 million. The proposed transaction, accordingly, is subject to 49 U.S.C. 14303.

6. Environmental effects:

The proposed transaction will have no significant effect on the quality of the human environment or the conservation of energy resources.

7. Consistency with the public interest:

(a) Crucero U.S.A., L.L.C., is seeking to be registered as a scheduled, regular-route bus operator serving the southwestern U.S., principally between Los Angeles, CA, and Phoenix, AZ, on the one hand, and, on the other, the Mexican border crossing points at San Ysidro and Calexico, CA, and Nogales and Douglas, AZ. The motorbus operator will concentrate on serving the transportation needs of Hispanic travelers to and from Mexico, with buses driven by Spanish speaking drivers, operating to and from terminals situated in neighborhoods populated by Mexican-Americans, placarded with signs and directions in Spanish, as well as English. Travel between the two nations advances the understanding of the peoples living on either side of the border and helps to cement the cordiality which long has characterized the relationship between them. The affiliation of Crucero U.S.A., L.L.C., with Greyhound and the eight passenger carriers indirectly controlled by Greyhound will safeguard that Crucero U.S.A., L.L.C., will have an adequate number of busses to meet the travel needs of its passengers, and, at such time when its busses are underutilized, Crucero U.S.A.,

L.L.C., will have the opportunity to make its busses available to its affiliated bus operators. Such arrangements will render the operations of Crucero U.S.A., L.L.C., efficient and economical, which will enure to the benefit of the public.

(b) The proposed transaction will have no effect on total fixed charges.

(c) The proposed transaction will have no adverse effect upon the employees of Applicants or their affiliated motor carriers of passengers. Crucero U.S.A., L.L.C., of course, currently has no employees.

8. Safety fitness ratings:

Applicants and their affiliated motor carriers of passengers have satisfactory safety ratings or are unrated, as shown on the attached chart of FMCSA Registered Affiliates. Crucero U.S.A., L.L.C., being an applicant for motor carrier registration, has no safety fitness rating.

9. Insurance:

Upon being registered as a motor carrier of passengers, Crucero U.S.A., L.L.C., will have in place the required \$5 million of BIPD insurance.

10. Mexican domicile or control:

Applicants, their affiliated motor carriers of passengers and Crucero U.S.A., L.L.C., are not domiciled in Mexico or controlled by persons of that country.

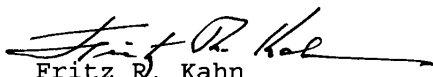
Respectfully submitted,

GREYHOUND LINES, INC.
And LAIDLAW INC.

By their attorneys,

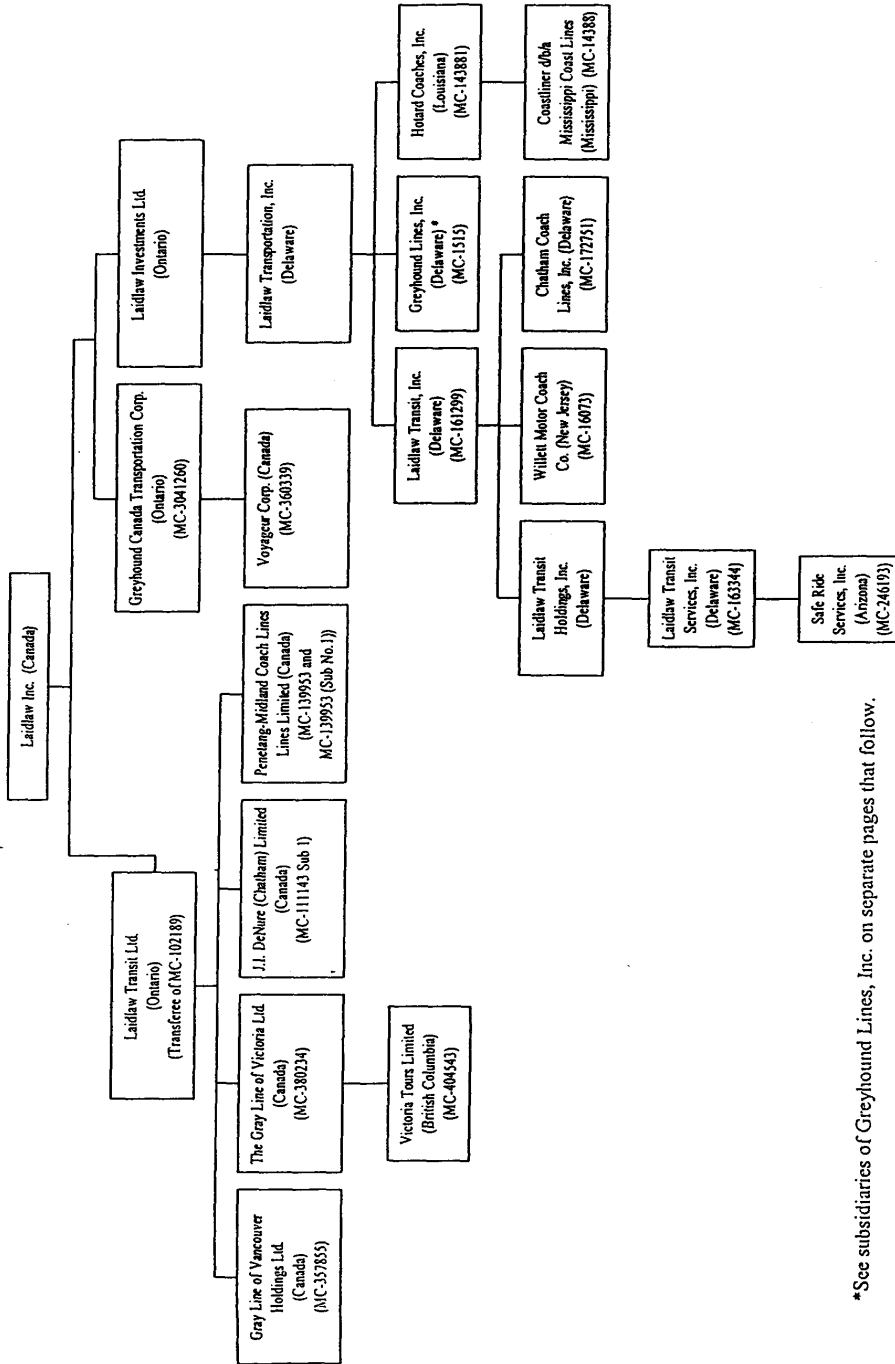
Mark E. Southerst
Vice President and General Counsel
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P. O. Box 660362
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Ivan Cairns
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P. O. box 5026
Burlington, ON, Canada L7R 3Y8

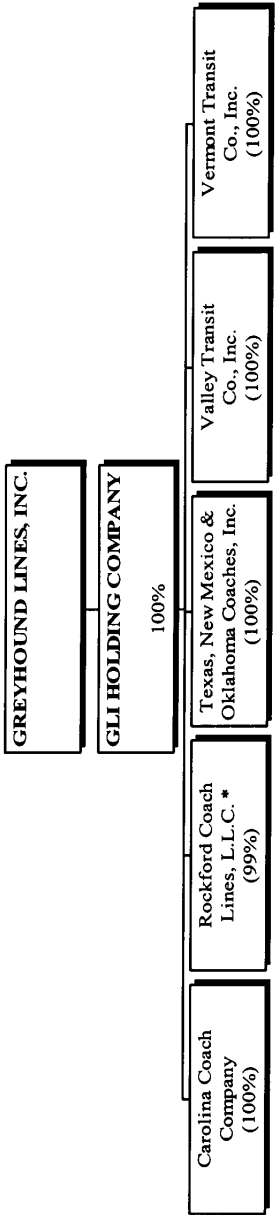

Fritz R. Kahn
Fritz R. Kahn, P.C.
1920 N Street, NW (8th fl.)
Washington, DC 20036-1601
Tel.: (202) 263-4152

Dated: August 21, 2002

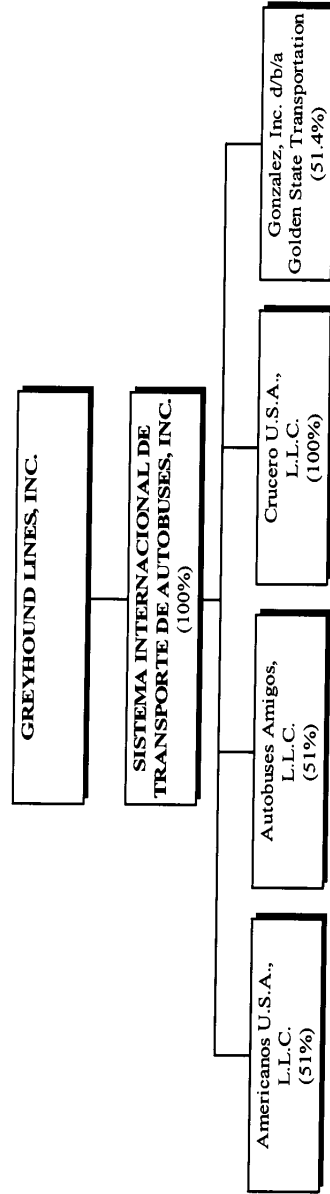
Organization of Laidlaw Motor Carrier Subsidiaries



*See subsidiaries of Greyhound Lines, Inc. on separate pages that follow.



* Owned 99% by GLI Holding Company and 1% by Greyhound Lines, Inc.



LIDLAW INC.

FMCSA REGISTERED MOTOR CARRIER AFFILIATES

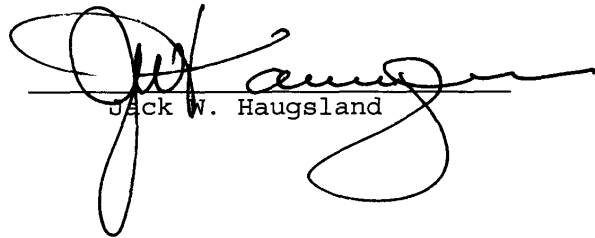
<u>Carrier</u>	<u>MC Number</u>	<u>DOT Number</u>	<u>Safety Rating</u>
Americanos U.S.A., L.L.C.	309813	781086	Satisfactory
Autobuses Amigos, L.L.C.	340462	756806	Satisfactory
Carolina Coach Company, Inc.	13300	90775	Satisfactory
Coastliner, d/b/a Mississippi Coast Limousine, Inc.	133182	87845	Unrated
Gonzalez, Inc., d/b/a Golden State Transportation Company	173837	250869	Satisfactory
Gray Line of Vancouver Holdings Ltd.	357855	803584	Unrated
Gray Line of Victoria, Ltd., The	380234	Unassigned	Unrated
Greyhound Canada Transportation Corp.	304126	14106	Satisfactory
Greyhound Lines, Inc.	1515	44110	Satisfactory
Hotard Coaches, Inc.	143881	156451	Conditional
Laidlaw Transit, Inc.	161299	711716	Unrated
Laidlaw Transit Ltd.	102189	Unassigned	Unrated
Laidlaw Transit Services, Inc.	163344	847250	Unrated
Rockford Coach Lines, L.L.C.	66810	76685	Satisfactory
Safe Ride Services, Inc.	246193	516743	Satisfactory
Texas, New Mexico & Oklahoma Coaches, Inc.	61120	149331	Satisfactory
Valley Transit Company, Inc.	74	136567	Satisfactory
Vancom Transportation — Illinois, L.P.	167816	Unassigned	Unrated
Vermont Transit Co., Inc.	45626	86293	Satisfactory
Victoria Tours Limited	404543	942200	Unrated

Voyageur Corp.	360339	810112	Unrated
Willett Motor Coach Co.	16073	143014	Satisfactory

VERIFICATION

I, Jack W. Haugslund, Executive Vice President and Chief Operating Officer of Greyhound Lines, Inc., declare under penalty of perjury, under the laws of the United States of America, that I have read the foregoing Verified Application of Greyhound Lines, Inc. and that its assertions are true and correct to the best of my knowledge, information and belief. I further declare that I am qualified and authorized to submit this verification on behalf of Greyhound Lines, Inc. 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.

Dated at Dallas, TX, this 20th of August 2002.



Jack W. Haugslund

VERIFICATION

I, Wayne R. Bishop, Vice President, Controller, of Laidlaw Inc., declare under penalty of perjury, under the laws of the United States of America, that I have read the foregoing Verified Notice of Exemption and that its assertions are true and correct to the best of my knowledge, information and belief. I further declare that I am qualified and authorized to submit this verification on behalf of Laidlaw Inc. 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.

Dated at Burlington, ON, this 20th day of August 2002.

Wayne Bishop

CERTIFICATE OF SERVICE

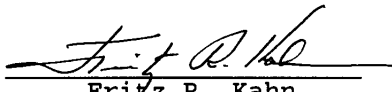
Copies of the foregoing Verified Application of Greyhound Lines, Inc., and Laidlaw Inc. this day were mailed by prepaid first class mail to:

Chief, Licensing & Insurance Division
Federal Motor Carrier Safety Administration
400 7th Street, SW
Washington, DC 2004

Motor Vehicle Division
Arizona Transportation Department
206 S. 17th Avenue
Phoenix, AZ 85007

Carrier Division
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dated at Washington, DC, this 21st day of August 2002.


Fritz R. Kahn