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April 1, 2010

VIA ELECTRONIC FILING

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

**Re: MC-F-21035, Stagecoach Group plc and Coach USA, Inc., et al.—
Acquisition of Control — Twin America, LLC**

Dear Ms. Brown:

On behalf of the Applicants in the above proceeding, I am writing to bring your attention to a further development in the New York State court litigation that was addressed in previous correspondence. *Continental Guest Services Corp. v. International Bus Services, Inc., et al.*, No. 600643/10 (NY Sup Ct. filed March 12, 2010). As reported previously, plaintiff Continental Guest Service Corporation (“CGSC”) seeks to permanently enjoin parties to the Twin America transaction (which is the subject of the Applicants’ Section 14303 application pending for approval before the Board) from pursuing that joint venture on the grounds that the transaction violates New York’s antitrust law. CGSC relies in part on representations made by the New York State Attorney General before the Board in the pending Section 14303 proceeding.

On March 29, 2010, CGSC submitted the attached letter to the New York Supreme Court (which is the trial level court) asking the Court to invite the New York State Attorney General to participate in an April 20, 2010 hearing in the case and reporting that the Attorney General would do so if invited by the Court. CGSC counsel has today circulated the attached April 1 letter indicating that the Court has directed the Attorney General to appear at the argument.

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The April 20 hearing has been scheduled in response to CGSC's request for a preliminary injunction that would extend a TRO, previously issued in its favor, barring Twin America and other defendants from exercising certain contract termination rights. CGSC asserts such actions would violate New York's antitrust laws.

Given the obvious relationship between the Court proceeding and the matter pending before the Board, and potential impact that a Court decision might have on this proceeding, Applicants will continue to keep the Board apprised of developments. Applicants will also provide the Board with a copy of the forthcoming submissions to be made on behalf of the Applicants that are defendants in the Court proceeding.

Respectfully submitted,



David H. Coburn
Attorneys for Applicants Stagecoach Group
plc; Stagecoach Transport Holdings plc.;
SCUSI Ltd.; Coach USA Administration,
Inc.; Coach USA, Inc.; International Bus
Services, Inc.; CitySights Twin, LLC; Mr.
Zev Marmurstein; and Twin America, LLC

cc: All parties of record
Mark A. Berman, Esq.

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March 29, 2010

BY HAND DELIVERY

Timothy Corbo, Esq.
Court Attorney to Hon. Charles E. Ramos
Supreme Court of the State of New York
County of New York
60 Centre Street, Room 691
New York, New York 10007

**Re: Continental Guest Services Corporation v. International
Bus Services, Inc., et al, Index No. 600643/10 (N.Y. Sup. Ct.)**

Dear Mr. Corbo:

We represent Plaintiff Continental Guest Services Corporation ("Plaintiff") in the above-referenced action and write requesting that the Court, in the interests of the public and Plaintiff in this action, request that the Antitrust Bureau of the New York State Attorney General Office's appear at the oral argument on Plaintiff's application for a preliminary injunction, which is now scheduled for Tuesday, April 20, 2010.

We have been in contact with the Antitrust Bureau of the Attorney General's Office, and have been advised that it is general office policy of the New York State Attorney General not to attend court proceedings involving private litigations, but, would do so in this case, were the Court so inclined.

Briefly, on March 12, 2010, Justice Ramos issued a temporary restraining order in favor of Plaintiff predicated upon claims that Defendants violated the Donnelly Act.

During oral argument, given the investigation conducted and comment issued by the New York State Attorney General that was annexed to Plaintiff's moving papers, Justice Ramos indicated on page 9 of the transcript of the oral argument that "[t]he attorney general hasn't acted yet, and we don't know if he's going to or not." Later in the transcript on page 14, counsel for defendants indicated that "the attorney general's action or investigation has nothing to do with ticket selling. It has to do with whether two

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Timothy Corbo, Esq.
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companies can have a joint venture together to operate a bus company." The Court responded that "I think to be fair to the attorney general, that report was focused in on one particular problem. But the plaintiff, the picture the plaintiff has painted now is somewhat more complicated." (A copy of the transcript of the oral argument is being provided herewith pursuant to Justice Ramos' Chambers Rules.)

In light of the above statements made during oral argument, it needs to be reiterated that the New York State Attorney General's comment annexed to Plaintiff's moving papers reads in relevant part:

Coordinated action by [Defendants Defendants International Bus Services, Inc. and City Sights Twin, LLC] can also eliminate competition for marketing with ticket selling partners, such as hotel concierges [such as Plaintiff]. . . . Coordinated action may foreclose new entrants from gaining access to a network of hotel lobby ticket counters, hotel concierges, and travel agents to sell sightseeing tours because of volume discounts, exclusivity or lack of bargaining power.

Accordingly, based on the above, where the New York State Attorney General has the expertise to address and is charged with enforcing the Donnelly Act and where he has already commenced an investigation relating to the above, we would respectfully request that the Court ask the New York State Attorney General to be present at the oral argument scheduled in this action.

We thank the Court in advance for its consideration.

Respectfully,



Mark A. Berman

cc: Assistant Attorney General James Yoon, Esq. (by fax w/encl.)
Michael Cohen, Esq.
(counsel for City Sights Twin LLC and Twin America LLC) (by fax w/encl.)
Alan G. Katz, Esq.
(counsel for City Sights Twin LLC and Twin America LLC) (by fax w/encl.)
Richard M. Steuer, Esq.
(counsel for International Business Services Inc.) (by fax w/encl.)
Alan D. Zuckerbrod, Esq. (counsel for the Hotel Defendants) (by fax w/encl.)

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April 1, 2010

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**Re: Continental Guest Services Corporation v. International
Bus Services, Inc., et al, Index No. 600643/10 (N.Y. Sup. Ct.)**

Dear Counsel:

We have been advised today by the Chambers of Justice Charles E. Ramos that we are to write a letter to all counsel and the New York State Attorney General indicating that the Court has directed that the Antitrust Bureau of the New York State Attorney General's Office appear at the oral argument on Plaintiff's application for a preliminary injunction, which is scheduled for Tuesday, April 20, 2010, at 11:00 a.m. in Room 238 at the Courthouse located at 60 Centre Street, New York, New York.

Sincerely,



Mark A. Berman

Enclosure

cc: Timothy Corbo, Esq., Court Attorney to Hon. Charles E. Ramos
(by fax)

CERTIFICATE OF SERVICE

I certify that I have this 1st day of April 2010 served a copy of the foregoing Letter of

Applicants by Federal Express on the parties listed below:

U.S. Department of Transportation
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

U.S. Department of Justice
Antitrust Division
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

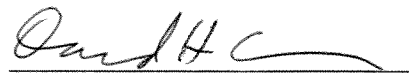
U.S. Department of Transportation
Office of the General Counsel
1200 New Jersey Avenue, S.E.
Washington, DC 20590

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