

STEPTOE & JOHNSON ^{LLP}

ATTORNEYS AT LAW

David H. Coburn
202.429.8063
dcoburn@steptoe.com

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
Tel 202.429.3000
Fax 202.429.3902
steptoe.com

May 3, 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: STB Docket Nos. MC-F-20904, MC-F-20908 and MC-F-20912, Petition of
Coach USA, Inc. and Megabus Northeast, LLC to Reopen Approval of
Fourth Amendment**

Dear Ms. Brown:

Enclosed please find a copy of the Petition of Coach USA, Inc. and Megabus Northeast, LLC to Reopen Approval of Fourth Amendment.

Respectfully submitted,



David H. Coburn
Attorney for Petitioner

cc: All parties of record

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Docket Nos. MC-F-20904, MC-F-20908 and MC-F-20912

**PETER PAN BUS LINES, INC.
--- POOLING ---
GREYHOUND LINES, INC.**

**PETITION OF
COACH USA, INC. AND MEGABUS NORTHEAST LLC
TO REOPEN APPROVAL OF FOURTH AMENDMENT**

David H. Coburn
Frederick J. Horne
Christopher Falcone
STEPTOE & JOHNSON LLP
1330 Connecticut Ave., NW
Washington, DC 20036
(202) 429-8063
dcoburn@steptoe.com

Attorneys for Coach USA, Inc. and
Megabus Northeast LLC

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Coach USA, Inc. and Megabus Northeast LLC (jointly, “Coach USA”) respectfully request that the Board reopen the April 17, 2008 approval granted to the Fourth Amendment to the Revenue and Pooling Agreements (“Fourth Amendment”) between two intercity motor passenger carriers, Peter Pan Bus Lines, Inc. (“PPB”) and Greyhound Lines, Inc. (“GLI”).¹ The amended Revenue and Pooling Agreements (“Pooling Agreements”) were initially approved by the Board in the three separate dockets in 1997 and 1998, and apply to certain intercity routes between New York City and Philadelphia, New York City and Boston/Springfield, MA and New York City and Washington, DC.² Those 1997/1998 pooling approvals were based largely on significant over-capacity and under-utilization then plaguing the intercity bus sector.

¹ GLI is owned by FirstGroup plc, a large UK transportation corporation that owns substantial transportation assets in Europe and North America. FirstGroup acquired GLI through the acquisition of GLI’s then parent company in September 2007. *See FirstGroup plc – Acquisition – Laidlaw International Inc.*, MC-F-21020 (served April 5, 2007).

² *Peter Pan Bus Lines, Inc.—Pooling—Greyhound Lines, Inc.*, STB Docket No. MC-F-20904 (served June 30, 1997) (New York-Philadelphia); *Peter Pan Bus Lines, Inc.—Pooling—Greyhound Lines, Inc.*, STB Docket No. MC-F-20912 (served Feb. 12, 1998) (New York-

The 2008 Fourth Amendment here at issue was presented to the Board by Greyhound's March 25, 2008 letter, supplemented by an April 2, 2008 letter. The GLI letters seeking approval of the Fourth Amendment and the Amendment itself are set forth as Exhibit 1 hereto. The manner of presentation of the Amendment was unorthodox and inconsistent with the Board's rules at 49 CFR Part 1184 specifying the contents of a pooling application.

The Fourth Amendment established a so-called "enhanced service" over the Philadelphia, Boston and Washington pooled routes in the form of a Greyhound/Peter Pan joint venture intercity curbside bus service known as BoltBus. Among other provisions, the Fourth Amendment provides for coordination between GLI and PPB with respect to the pricing and schedules for the BoltBus service, for the joint formulation of Capital and Operating budgets and for a formula under which revenues are shared between GLI and PPB. It also provides for the applicability of the terms of the Pooling Agreements except to the extent modified by the Fourth Amendment. According to Greyhound's April 2 letter to the Board, "pursuant to the Fourth Amendment [the BoltBus] operations will inure to the benefit of both Peter Pan Bus Lines, Inc. and Greyhound."³

By virtue of an April 17, 2008 letter sent by the Board's then Acting Secretary to Greyhound's counsel, the Fourth Amendment was approved. See Exhibit 2. That approval was provided informally, without any invitation for public comment, the issuance of any public notice by the Board, and without any Board finding (contemplated by the Board's rules) as to

Boston and Springfield, MA); *Peter Pan Bus Lines, Inc.—Pooling—Greyhound Lines, Inc.*, STB Docket No. MC-F-20908 (served Apr. 29, 1998) (New York-Washington, DC).

³ GLI and PPB did not file a control application under 49 U.S.C. 14303 relative to BoltBus, presumably because they did not establish that service as a separate carrier with its own operating authority, but rather operate the service under GLI's operating authority. Of course, by operating BoltBus under an approved Section 14302 pooling arrangement, GLI and PPB are able to share the risks and rewards of those operations on a continuing basis.

whether or not the Amendment was of “major transportation importance.” The April 17 letter provides no specific justification for the modification of the Pooling Agreements, but instead concludes that the Fourth Amendment “falls within the scope of the Board’s prior [1997/1998] authorizations and no formal Board action is needed.” Further, mirroring a description of the BoltBus service in Greyhound’s April 2 letter, the April 17 letter recited that the BoltBus service will be a curbside service “offered only during the morning and evening peak travel times.” However, since April 2008, BoltBus service has been operated on the pooled routes between New York-Philadelphia, New York-Boston and New York-Washington throughout the day and evening as a joint venture by PPB and GLI.

Coach USA submits that there have been dramatically changed circumstances described in this Petition since the April 17, 2008 approval of the Fourth Amendment and that reopening is justified pursuant to 49 U.S.C. § 722(c) and 49 CFR 1115.4.⁴ Further, even if circumstances had not changed, the Board appears to have ample authority under 49 U.S.C. § 14302(e) to initiate a proceeding to reconsider its prior approval on its own initiative or on application. Justification for reopening is provided by the fact that intercity bus service on the pooled routes served by BoltBus is now significantly more competitive as evidenced by new entrants into the curbside bus sector and a dramatic growth in demand and ridership. The need for Board intervention to coordinate a reduction in competition and capacity in order to assist financially unstable carriers – which may have supported approval of the original Pooling Agreements over

⁴ 49 U.S.C. § 722(c) states, “The Board may, at any time on its own initiative because of material error, new evidence, or substantially changed circumstances - (1) reopen a proceeding; (2) grant rehearing, reargument, or reconsideration of an action of the Board; or (3) change an action of the Board.” 49 CFR 1115.4 states, “A person at any time may file a petition to reopen any administratively final action of the Board pursuant to the requirements of 1115.3 (c) and (d) of this part. A petition to reopen must state in detail the respects in which the proceeding involves material error, new evidence, or substantially changed circumstances and must include a request that the Board make such a determination.”

a decade ago – simply does not exist in the new marketplace in which BoltBus, GLI and PPB compete.

The changed circumstances, described below, make it clear that the rationale for approving the PPB-GLI pooling agreements in 1997/1998 does not apply to the BoltBus service. In short, whatever economic basis may have justified pooling on those routes through an enhanced service joint venture in April 2008 no longer exists. The bleak picture of the intercity bus industry painted in the 1997/1998 GLI/PPB pooling applications stands in sharp contrast to the profitable and apparently highly successful operation of BoltBus.

Coach USA accordingly urges the Board to initiate appropriate proceedings to reconsider and revoke approval of the Fourth Amendment because pooling with respect to the BoltBus service is not warranted by the current economically robust circumstances in which that service operates. Further, revocation is also warranted because GLI and PPB have exceeded the terms under which the approval of the pooled service was granted by operating BoltBus service other than at peak morning and evening times.

I. The Justifications Offered for 1997 and 1998 Greyhound-Peter Pan Pooling Agreements

The Board may approve a pooling arrangement if it finds that “a pooling or division of traffic, services, or earnings - (1) will be in the interest of better service to the public or of economy of operation; and (2) will not unreasonably restrain competition.” 49 U.S.C. § 14302(b). In connection with the Fourth Amendment to their previously approved Pooling Agreements, neither GLI nor PPB made any effort to offer a new justification under these statutory criteria for the approval of that Amendment. In GLI’s March 25, 2008 letter, that carrier asserted that the Fourth Amendment was merely “minor” and “ministerial” and did not fully explain that the two carriers were setting up a substantial and altogether new bus service.

In its April 2, 2008 supplemental letter, GLI claimed that the enhanced service contemplated by the Fourth Amendment was “designed to permit Peter Pan Bus Lines, Inc. and Greyhound Line, Inc. to more effectively compete with so-called Chinatown bus operators, rendering service principally between Washington and New York and between New York and Boston.” This “justification,” however, does not purport to satisfy the Section 14302 criteria since pooling is not justified by enhancing the ability of a two bus carriers to meet the competition of other bus carriers, but rather by circumstances where pooling is needed to improve (or, more frequently, maintain) service to the public or economy of operation. GLI made no effort in its letter to show that pooling with respect to the BoltBus service was needed to improve service or economy of operation, or that GLI could not achieve these goals were it or PPB to operate BoltBus outside of a pooling agreement.

In failing to make any showing in support of the Fourth Amendment under the Section 14302 criteria, GLI and PPB effectively fell back on the showing that they made in support of their Pooling Agreements in 1997 and 1998, claiming that the Amendment was merely a minor change to those earlier-approved arrangements. Thus, it is relevant for the Board to consider today whether the justifications offered in 1997 and 1998 can support continued approval of the Fourth Amendment in 2010, as these are the only justifications that purport to be grounded in the relevant statute. We submit that the justifications provided in the late 1990’s do not support approval of the Fourth Amendment.

As to the first Section 14302 element (improvement of service to the public or economy of operation), PPB and GLI argued in their 1997/1998 pooling applications that continuing competition between them in the face of excess capacity was inefficient and undermined the

financial viability of the carriers. The carriers were providing overlapping service and maintaining excessive schedules because they felt compelled “to protect their respective market shares, notwithstanding the fact that operating that number of schedules results in the market being over-served, operating inefficiencies and lost opportunities for both companies.”⁵ Load factors on the routes to be pooled were assertedly “unacceptably low,” were an “intolerable drain” on resources,⁶ and made “bus transportation less competitive against other modes.”⁷ Coordination of schedules and sharing revenues was, according to PPB and GLI, necessary to eliminate overlapping services, increase load factors, and achieve financial stability. This financial stability, it was argued, would in turn enable Peter Pan and Greyhound to invest in more modern, efficient equipment and would ensure the continued viability of intercity bus travel.⁸

⁵ *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc.*, STB Docket No. MC-F-20912 (Sept. 19, 1997) at 3 [hereinafter MC-F-20912 Application]; *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc.*, STB Docket No. MC-F-20908 (May 20, 1997) at 3 [hereinafter MC-F-20908 Application]; *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc., Verified Statement of Gregory Alexander*, STB Docket No. MC-F-20904 (Jan. 24, 1997) at 2 [hereinafter MC-F-20904 Application].

⁶ MC-F-20912 Application at 3; MC-F-20908 Application at 3; MC-F-20904 Application at 3.

⁷ *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc., Verified Statement of Gregory Alexander*, STB Docket No. MC-F-20912 (Sept. 19, 1997) at 3 [hereinafter MC-F-20912 Alexander Statement]; *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc., Verified Statement of Gregory Alexander*, STB Docket No. MC-F-20908 (May 20, 1997) at 3 [hereinafter MC-F-20908 Alexander Statement]; *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc., Verified Statement of Gregory Alexander*, STB Docket No. MC-F-20904 (Jan. 24, 1997) at 2 [hereinafter MC-F-20904 Alexander Statement].

⁸ *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc., Verified Statement of Peter A. Picknelly*, STB Docket No. MC-F-20912 (Sept. 19, 1997) at 11, 13 [hereinafter MC-F-20912 Picknelly Statement]; *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc., Verified Statement of Peter A. Picknelly*, STB Docket No. MC-F-20908 (May 20, 1997) at 10-11 [hereinafter MC-F-20908 Picknelly Statement]; *Application of Peter Pan Bus Lines, Inc. & Greyhound Lines, Inc., Verified Statement of Peter A. Picknelly*, STB Docket No. MC-F-20904

GLI and PPB argued that coordinated operations would enhance the convenience of bus travel. For example, they asserted that the two companies scheduled many of their buses at exactly the same time to remain competitive.⁹ If they could coordinate schedules, however, they could “eliminate some Peter Pan or Greyhound schedules which... both depart[ed] at the same time on the hour, but also add some departures on the half hour during the busier times of the day.”¹⁰ GLI and PPB also pointed to the added convenience for customers of coordinated ticketing operations and facilities use. They argued that “it will be the passengers who will benefit most from the consolidation of terminals, for they would not need to go from one boarding location to a distant separate boarding location within the same terminal, or from one facility to another when changing from a PPB bus to a connecting GLI bus, or from a GLI bus to a connecting PPB bus.”¹¹ In addition, coordinated ticketing would assertedly provide benefits to passengers purchasing connecting services because it would “eliminate the need for passengers

(Jan. 24, 1997) at 8-9 [hereinafter MC-F-20904 Picknelly Statement]; MC-F-20912 Alexander Statement at 4; MC-F-20908 Alexander Statement at 4.

⁹ See *supra* note 5.

¹⁰ MC-F-20912 Picknelly Statement at 8; MC-F-20908 Picknelly Statement at 6; MC-F-20904 Picknelly Statement at 5.

¹¹ MC-F-20912 Alexander Statement at 5; see also MC-F-20908 Alexander Statement at 4 (“[T]he travelling public would benefit in that passengers travelling on the New York-Washington route who are destined to points beyond that route and who need to transfer from GLI to PPB or vice versa, would no longer be required to go from one terminal to another in order to make their connection, for both carriers would be located in the same terminal.”); MC-F-20904 Alexander Statement at 3-4 (“[T]he travelling public would benefit in that passengers travelling on the New York-Philadelphia route who are destined to points beyond that route and who need to transfer from GLI to PPB or vice versa, would no longer be required to go from one terminal to another in order to make their connection, for both carriers would be located in the same terminal.”).

to stand in two ques to purchase a ticket”¹² and would allow transferring passengers to “take the ‘next bus out’ regardless of whether it was a Peter Pan or Greyhound...”¹³

With respect to the second Section 14302 criterion, effect on competition, GLI and PPB argued in 1997/1998 that the pooling agreement would not unreasonably restrain competition because of strong competition from other modes of transportation and the relatively small share of intercity passenger service represented by bus service.¹⁴ However, they also painted a picture of an industry in decline where pooling agreements were necessary to prevent one company from dominating the industry and to allow the industry to provide real competition to other modes of transportation. For example they cited an ICC study noting that “the intercity bus mode represents a small and declining share of the broader market of intercity passenger service” and that “it is in the bus industry’s best interest to work together to revitalize this industry by lowering costs and by improving service to passengers.”¹⁵ They also stated that “by combining operations over the involved route PPB and GLI . . . will become more competitive with Amtrak, the airlines, and private automobiles”¹⁶ and that “[a]s Coach USA emerges as one of the major entities in the bus industry, in order to maintain competition from independent carriers such as

¹² *MC-F-20912 Picknelly Statement* at 5; *MC-F-20908 Picknelly Statement* at 5; *MC-F-20904 Picknelly Statement* at 4.

¹³ *MC-F-20912 Picknelly Statement* at 10; *MC-F-20908 Picknelly Statement* at 9.

¹⁴ *MC-F-20912 Picknelly Statement* at 5-6; *MC-F-20912 Picknelly Statement* at 5-6; *MC-F-20904 Application* at 5-6.

¹⁵ *MC-F-20912 Application* at 5, 7; *MC-F-20908 Application* at 5, 7; *MC-F-20904 Application* at 5-6.

¹⁶ *MC-F-20912 Alexander Statement* at 9; *MC-F-20908 Alexander Statement* at 8; *MC-F-20904 Alexander Statement* at 7.

Peter Pan, it is more important than ever for Peter Pan to be able to enter into strategic pooling agreements”¹⁷

In the next section of this Petition, Coach USA will demonstrate that these justifications for pooling, provided at a time when the intercity bus industry was struggling for passengers and operating in financially challenging circumstances, cannot sustain continued Board support for the Fourth Amendment.

II. Changes in the Intercity Bus Industry Have Made It Clear that the Justifications for the 1997 and 1998 GLI-PPB Pooling Agreements Are Not Applicable to BoltBus Service

In finding that the original Pooling Agreements met the criteria of 49 U.S.C. § 14302(b), the Board relied on the justifications discussed above. In particular, the Board pointed to the likely increase in passenger loads, greater financial stability and associated capital improvements, the expansion of available departure times, the benefits of coordinated terminal use and ticketing operations, and strong intermodal competition.¹⁸

At the time that the Fourth Amendment to those Pooling Agreements was presented to the Board in March and April 2008, change in the intercity bus sector on the BoltBus routes was on the horizon. The so-called “Chinatown” operators had been offering low-cost, low-fare curbside service on these routes, although they frequently changed schedules, did not generally

¹⁷ *MC-F-20912 Picknelly Statement* at 17; *MC-F-20908 Picknelly Statement* at 15. Peter Pan’s reference to the importance of it remaining “independent” is odd given its arrangement with Greyhound, a clear sign of its decision to coordinate rather than remain entirely independent. In any event, Coach USA agrees with Peter Pan’s goal.

¹⁸ See *Peter Pan Bus Lines, Inc.—Pooling—Greyhound Lines, Inc.*, STB Docket No. MC-F-20912 (served Feb. 12, 1998) at 2; *Peter Pan Bus Lines, Inc.—Pooling—Greyhound Lines, Inc.*, STB Docket No. MC-F-20904 (served June 30, 1997) at 2; *Peter Pan Bus Lines, Inc.—Pooling—Greyhound Lines, Inc.*, STB Docket No. MC-F-20908 (served Apr. 29, 1998) at 5-6.

provide amenities and, in some cases, operated in violation of safety laws.¹⁹ Further, the demand for intercity bus services in the Northeast U.S. was just beginning to grow again after decades of decline.²⁰

Whatever may have been the situation in early 2008, when the Fourth Amendment was approved, is surely no longer the case two years later. The introduction of BoltBus in the spring of 2008, followed by the entry a short time later of Megabus on the same routes, and the subsequent entry of several other similar curbside intercity operators, revolutionized motorcoach service on the routes served by BoltBus.²¹ Each of these carriers offers low-fare, high amenity

¹⁹ See e.g., JOSEPH P. SCHWIETERMAN ET AL., DEPAUL UNIVERSITY, THE RETURN OF THE INTERCITY BUS: THE DECLINE AND RECOVERY OF SCHEDULED SERVICE TO AMERICAN CITIES 9 (2007) [hereinafter SCHWIETERMAN ET AL., THE RETURN OF THE INTERCITY BUS] (“These carriers...frequently change their schedules and in some cases operate in violation of safety laws.”); JOSEPH P. SCHWIETERMAN ET AL., DEPAUL UNIVERSITY, IS PORTABLE TECHNOLOGY CHANGING HOW AMERICANS TRAVEL? A SURVEY OF THE USE OF ELECTRONIC DEVICES ON INTERCITY BUSES, TRAINS AND PLANES 6 (2009) (describing how BoltBus and Megabus started offering wireless internet service in 2008 and that “[v]arious ‘Chinatown’ carriers... attempted to forestall their loss in market share by spending an estimated \$5,000 per vehicle to equip their buses with Wi-Fi.”); Bill Brubaker, *Some Low-Fare ‘Chinatown’ Buses Told to Halt Over Safety*, WASH. POST, Nov. 23, 2005, at A1, available at http://www.washingtonpost.com/wp-dyn/content/article/2005/11/22/AR2005112202037_2.html. These materials are provided in exhibit 3, 4 and 5.

²⁰ See e.g., SCHWIETERMAN ET AL., THE RETURN OF THE INTERCITY BUS 2 (“This year, for the first time in more than 40 years, regularly scheduled intercity bus service grew appreciably both in the eastern and in the western sections of the country...”); JOSEPH P. SCHWIETERMAN ET AL., DEPAUL UNIVERSITY, 2008 UPDATE ON INTERCITY BUS SERVICE: SUMMARY OF ANNUAL CHANGE 1 (2008) [hereinafter SCHWIETERMAN ET AL., UPDATE ON INTERCITY BUS SERVICE] (“Scheduled bus service grew 9.8% between the fourth quarters of 2007 and 2008. This marks two consecutive years of robust growth after more than four decades of persistent decline... Most of the growth over the past year has been attributable to the introduction of new service with curbside pick-up in the northeastern states.”). These materials are provided at exhibits 3 and 6.

²¹ Megabus Northeast LLC began serving the Northeast and Middle Atlantic U.S. routes served by BoltBus (as well as other routes in the Northeast) in May 2008. In April 2006, another Coach USA subsidiary, Megabus USA LLC, had initiated similar high-quality, curbside intercity bus service in the Midwest out of a hub in Chicago. Neither Megabus subsidiary operates under a pooling agreement.

express service, relies on Internet sales as a means of keeping costs low, and avoids costly bus terminal fees by picking up and discharging passengers on the street.²² The services of these operators has proven to be extremely popular, resulting in a dramatic growth of the number of passengers traveling by bus between New York, Philadelphia, Boston, and Washington (the routes served by BoltBus) and other routes between major population centers.

In fact, a GLI spokesman has been quoted as saying that BoltBus became profitable in May 2008, ahead of GLI's expectations.²³ Further, in a March 23, 2010 letter to the Board, GLI described the market in which BoltBus operates as a "rapidly expanding, vibrant niche market, enjoying 60% growth in sales in 2009" and quoted a report stating that "the majority of this growth in service was driven by... Megabus and BoltBus..."²⁴ The growth of the sector and the profitability of BoltBus offers clear evidence that the 1997/1998 justifications for pooling do not extend to the operations of that service. Additional evidence that the sector in which BoltBus operates is financially viable, and indeed attractive, is the entry over the last several years of new competitors into the intercity motorcoach sector in the Northeast U.S. In addition to BoltBus and to incumbents GLI and PPB (which continue to operate their own services) these entrants include three carriers that have entered since BoltBus began operations -- Megabus, Hola Bus, and Tripper Bus -- and other carriers that have expanded or maintained competing

²² See e.g., BoltBus, <https://www.boltbus.com/>; *Hip to Hopping the Bus*, CBS NEWS, Aug. 4, 2008, <http://www.cbsnews.com/stories/2008/08/04/travel/main4318695.shtml> ("Bolt Bus offers amenities including wireless internet, electrical outlets, extra leg room and flushable toilets... They also operate outside of terminals, saving companies millions in building and labor costs... [Megabus] offers perks comparable to BoltBus."). These materials are provided in Exhibits 7 and 8.

²³ *Hip to Hopping the Bus*, CBS NEWS, Aug. 4, 2008, <http://www.cbsnews.com/stories/2008/08/04/travel/main4318695.shtml>. Provided at Exhibit 8.

²⁴ MC-F-20908, *Peter Pan Bus Lines, Inc. – Pooling – Greyhound Lines, Inc.* (served March 24, 2010) at 4.

service -- Vamoose, Washington Deluxe, Limoliner and DC2NY, together with several Chinatown carriers.²⁵ The intercity services on the BoltBus routes are in fact so plentiful now that a website has been established to display the services of the numerous competing bus operators and allow consumers to better choose among the various price and service options.²⁶

The changed circumstances within the bus industry have made it clear that the justifications for the original pooling agreements in the late 1990's do not apply to the operations of BoltBus. Further, as noted above, in its March and April 2008 letters GLI offered no additional justifications of the type required by Section 14302 for why GLI and PPB should be permitted to jointly operate BoltBus under a pooling agreement. Nor is there any such justification.²⁷

As described above, with respect to economy of operation, PPB and GLI (which, as noted above, was purchased by FirstGroup, a large UK-based transportation company in September 2007) originally argued that schedule coordination and revenue sharing was needed to eliminate the overlapping service that was resulting in low load factors and threatening the financial viability of each carrier. The carriers essentially sought Board approval to ensure their survival

²⁵ See Megabus, <http://us.megabus.com/>; Hola Bus, <https://www.holabus.com/>; Tripper Bus, <http://www.tripperbus.com/>; Vamoose, <http://www.vamoosebus.com/>; Washington Deluxe, <http://www.washny.com/>; Limoliner, <http://www.limoliner.com/>; DC2NY, <http://www.dc2ny.com/>.

²⁶ Busjunction, <http://busjunction.com> (providing available departures and fares for various carriers operating between New York, NY and Boston, MA; New York, NY and Washington, DC; and New York, NY and Philadelphia, PA). See Exhibit 9.

²⁷ As noted above, the only argument that GLI made in favor of the Fourth Amendment was that "the enhanced service contemplated by the Fourth Amendment is designed to permit Peter Pan Lines, Inc. and Greyhound Lines, Inc. more efficiently to compete with the so-called Chinatown bus operators..." See April 2, 2008 letter at Exhibit 1. However, enhancing the ability of two carriers to compete through pooling with others is not a sufficient justification for pooling.

and address falling demand by coordinating the elimination of excess capacity from the market. They did so consistent with the purpose of pooling, which the Board's predecessor described as "to allow carriers to combine their resources to promote maximum efficiency when there is insufficient volume of traffic for the number of carriers to transport it." *Policy Statement on Moto Carrier Pooling*, 127 M.C.C. 746 (ICC 1981) (emphasis added).

By stark contrast, the last several years have been marked by expanding demand for the type of service offered by BoltBus and the new entrants (listed above) attracted into the sector on the routes served by BoltBus.²⁸ Experts have cited "digitally connected youngsters, inner-city revitalization, new bus design and online ticketing,"²⁹ as well as higher fuel prices and rising traffic congestion³⁰ as the primary factors driving this increased demand. Regardless of what is driving demand, these new companies have demonstrated that they can successfully operate

²⁸ See e.g., SCHWIETERMAN ET AL., THE RETURN OF THE INTERCITY BUS 10 ("The 6.9 percent annual growth rate, compared to an 8 percent annual rate of decline during the previous period, was largely attributable to a new breed of motor-coach operators operating without conventional terminals, generally leaving from curbside locations or public-transit facilities."); Gabriella Boston, *Bus Trips Rediscovered by Young, Hip*, Wash. Times, June 24, 2009, at B1, available at <http://www.washingtontimes.com/news/2009/jun/24/leave-the-driving-to/> (explaining that services such as BoltBus and Megabus "have gained huge market share"); Andrea Sachs, *Back on the Bus, We Got on Board, Too, To See What's Driving the Boom*, Wash. Post, Aug. 30, 2009, at F1, available at <http://www.washingtonpost.com/wp-dyn/content/article/2009/08/27/AR2009082703374.html> ("On a more local level, new bus lines are popping up like wildflowers on a median strip: DC2NY (inaugurated July 2007), BoltBus and Megabus (spring 2008), Tripper Bus (February), Hola (July)."); *Rolling With It, The Best Bus for Your Buck*, Washingtonpost.com, <http://www.washingtonpost.com/wp-srv/artsandliving/travel/busreview/index.html> (listing various low-cost, curbside bus services between Washington, DC and New York, NY). These materials are provided at Exhibits 3, 10, 11, and 12.

²⁹ Gabriella Boston, *Bus Trips Rediscovered by Young, Hip*, Wash. Times, June 24, 2009, at B1, available at <http://www.washingtontimes.com/news/2009/jun/24/leave-the-driving-to/>. Provided at Exhibit 10.

³⁰ See SCHWIETERMAN ET AL., THE RETURN OF THE INTERCITY BUS 11. Provided at Exhibit 3.

without the special benefits, including antitrust immunity of the sort extended to pooling carriers, provided to BoltBus by GLI/PPB pooling agreements. *See* 49 U.S.C. § 14303(f) (exempting carriers party to approved pooling agreements from the antitrust laws as necessary to carry out the pooling agreement.)

The entry and success of these new independent carriers into the intercity motorcoach sector in the Northeast U.S. demonstrates that potential competitors do not need to coordinate schedules and share revenues in order to improve or maintain service and financial stability. Were demand growing and new competitors entering rather than leaving the market when GLI and PPB filed their 1997/1998 pooling applications, it is virtually certain that the Board would not have granted their pooling applications. Why then should the Board continue its approval of an amendment that expands those Pooling Agreements to embrace their profitable joint venture, BoltBus?

The question is particularly relevant because the pooling agreement approval for BoltBus gives that entity an unfair advantage over its now numerous competitors. That entity benefits from the resources of two substantial carrier owners which are permitted to share expenses and risks, and to coordinate services and fares free of antitrust concern. Megabus and other competitors on these routes have no such ability. Further, if coordination and revenue sharing are not necessary for BoltBus to operate efficiently and maintain financial stability, the antitrust immunity for operational activities granted by the Pooling Agreements is not necessary for these purposes either.³¹

³¹ *See e.g., Andrews Van Lines, Inc. Fogarty Transportation Inc., Mercury Van Lines, Inc., and Security Van Lines, Inc.—Pooling Application*, 1986 MCC LEXIS 392 at *4-5 (served May 16, 1986) (“[I]nasmuch as pooling may result in reducing or eliminating competition, it raises antitrust concerns... It is well settled that exemptions from the antitrust laws... should be narrowly construed.”); *Motor Carrier Bureaus—Period Review Proceeding; Investigation into*

The arguments originally made by PPB and GLI in their pooling applications from the late 1990's concerning improved service to the public are no more applicable to BoltBus than the arguments regarding economy of operations. As discussed above, in the late 1990s, PPB and GLI argued that the pooling agreements would provide the financial stability necessary to invest in and maintain a modern fleet of motorcoaches. Independently operated competitors of BoltBus, however, are performing well and offer the same types of amenities on their buses.³² It merits reiterating that GLI is now part of the FirstGroup family of companies and thus has substantial assets behind it. Further, PPB is not a small company, and in fact bought five New England bus companies from Coach USA in 2002.

PPB and GLI also relied in their 1997/1998 filings on the enhanced convenience to passengers seeking connecting services that would result from coordinating ticketing operations and facilities use. However, GLI and PPB have not structured BoltBus ticketing and facilities use in a manner that enhances convenience to connecting passengers. BoltBus tickets are not

the Practices of the National Classification Committee; Southern Motor Carriers Rate Conference, Inc. Ex Parte No. 656, et al. (served May 7, 2007) at 22 (“Moreover, antitrust immunity is not necessary to create or maintain a classification system or systems...”).

³² See e.g., SCHWIETERMAN ET AL., UPDATE ON INTERCITY BUS SERVICE 3 (“Megabus traffic grew 97% between October 2007 and October 2008”); *Hip to Hopping the Bus*, CBS NEWS, Aug. 4, 2008, <http://www.cbsnews.com/stories/2008/08/04/travel/main4318695.shtml> ([Megabus] offers... perks comparable to BoltBus.”); Gabriella Boston, *Bus Trips Rediscovered by Young, Hip*, Wash. Times, June 24, 2009, at B1, available at <http://www.washingtontimes.com/news/2009/jun/24/leave-the-driving-to/> (“Intercity buses that take the young and hip between destinations such as New York and the District have gained huge market share, while air and car travel are hurting.”); *Rolling With It, The Best Bus for Your Buck*, Washingtonpost.com, <http://www.washingtonpost.com/wp-srv/artsandliving/travel/busreview/index.html> (listing the amenities available on carriers providing low-cost curbside service between Washington, DC and New York, NY); Coach USA, *Megabus.com Recognizes Millionth Customer*, May 1, 2008, <http://www.coachusa.com/info/coachusa/press/pressreleases.007.release.asp> (“The overwhelming popularity of megabus.com's innovative, express bus service prompts us to keep expanding and offering our service to as many customers as possible...”); These materials are available at Exhibits 3, 8, 10, 12 and 13.

good for travel on PPB or GLI buses. Nor does BoltBus generally share facilities with PPB or GLI to enhance convenience for travelers seeking connecting service.³³ Furthermore, BoltBus does not sell single through tickets for connecting BoltBus service nor does it generally operate services departing for one city from the same location as services arriving from another city.³⁴ For example, passengers seeking to take BoltBus from Baltimore to Boston or from Boston to Washington, DC would have to buy two separate tickets: one for the trip from the city of origin to New York and another from New York to the city of destination.³⁵ In addition, the passenger would have to travel from one bus stop to another in order to catch the second bus.³⁶ This process is no more convenient for a connecting passenger than if the two legs of the trip were handled by separate companies. Since the coordination of operations and revenue sharing are not necessary to provide the level of service currently offered by BoltBus, pooling approval for that carrier is not necessary.

³³ BoltBus generally departs from the curbside, not bus terminals. The exceptions to this are South Station in Boston from which GLI and PPB operate and Union Station in Washington, DC, from which PPB and GLI do not operate. *See* BoltBus, BoltBus Destinations, <https://www.boltbus.com/wherewetravel.aspx> (listing the bus stops from which BoltBus operates). These materials are provided at Exhibit 14.

³⁴ At Boltbus.com when Baltimore is selected as the departing city, the only available destination is 33rd Street and 9th Avenue in New York but Boston cannot be selected as a destination where 33rd Street and 9th Avenue is selected as the departing destination. BoltBus only operates buses to Boston from New York from 34th Street and 8th Avenue. BoltBuses to Washington, DC only leave New York from either 33rd Street and 9th Avenue or Canal Street and 6th Avenue. However, it does appear that service between New York and Philadelphia utilizes the same bus stop as service between New York and Boston. *See* BoltBus, <https://www.boltbus.com/>.

³⁵ At BoltBus.com there is no option for purchasing a ticket from Boston to Washington, DC or from Baltimore to Boston. *See* BoltBus, <https://www.boltbus.com/>.

³⁶ *See supra* note 34.

The arguments regarding the effect of pooling on competition hold true today to the extent that there is still strong competition from other modes of transportation and bus transportation continues to constitute a relatively small share of intercity travel. However, when the Pooling Agreements were initially approved, bus transportation was losing market share to other modes of transportation and many independent carriers had recently gone out of business.³⁷ Today, in contrast, intercity bus transportation is growing relative to other modes of transportation and numerous independent carriers have entered the market in recent years.³⁸ Thus, it cannot be argued that Pooling Agreements are currently necessary to make bus transportation more competitive with other modes of transportation or to prevent one company from dominating the industry, as GLI and PPB argued in the late 1990s. In fact, allowing BoltBus to be operated under a pooling umbrella gives GLI and PPB certain competitive advantages over other intercity carriers, such as the ability to share price data and pool capital and risks. Unless GLI and PPB can demonstrate why it is necessary to allow BoltBus to operate

³⁷ See e.g., *MC-F-20908 Application* at 5 (quoting an ICC study stating, “[T]he intercity bus mode represents a small and declining share of the broader market of intercity passenger service.”); *MC-F-20912 Picknelly Statement* at 13 (“Improved results from pooling also enhance Peter Pan’s place in the market...in an industry in which many long-time carriers have not survived deregulation.”).

³⁸ See e.g., SCHWIETERMAN ET AL., UPDATE ON INTERCITY BUS SERVICE 1 (“The increase in the amount of service provided by the intercity bus sector has significantly outpaced other modes of intercity transportation... Most of the growth over the past year has been attributable to the introduction of new service with curbside pick-up in the northeastern states.”); Gabriella Boston, *Bus Trips Rediscovered by Young, Hip*, Wash. Times, June 24, 2009, at B1, *available at* <http://www.washingtontimes.com/news/2009/jun/24/leave-the-driving-to/> (“Intercity buses that take the young and hip between destinations such as New York and the District have gained huge market share, while air and car travel are hurting.”); Andrea Sachs, *Back on the Bus, We Got on Board, Too, To See What’s Driving the Boom*, Wash. Post, Aug. 30, 2009, at F1, *available at* <http://www.washingtonpost.com/wp-dyn/content/article/2009/08/27/AR2009082703374.html> (“On a more local level, new bus lines are popping up like wildflowers on a median strip: DC2NY (inaugurated July 2007), BoltBus and Megabus (spring 2008), Tripper Bus (February), Hola (July).”). These materials are provided at Exhibits 6, 10 and 11.

and compete under a pooling agreement against non-pooling carriers, the Board should not permit BoltBus to be operated pursuant to a pooling agreement.

It should be noted that Coach USA is not here asking the Board to prohibit GLI and/or PPB from operating on the routes currently operated by BoltBus. The issue here is not whether they are free to compete with Megabus or others, but rather whether they should be allowed to compete with the benefit of a pooling agreement amendment that they have not justified. The Board is not being asked here to narrow the playing field, only to level it.

III. GLI and PPB are Exceeding the Terms of Approval of the Fourth Amendment

There is one additional circumstance that has changed that does not relate to justifications relied on by PPB and GLI in their initial pooling applications. Since the Fourth Amendment was approved by the Board, BoltBus has begun to offer service for which the Board did not give its approval. In its April 2, 2008 letter offered in support of Fourth Amendment, GLI noted that the Chinatown operators “do not offer service during the days but only at morning and evening peak travel times.” The letter proceeded to state that BoltBus “will operate similarly.” In response, the April 17 approval letter from the Board’s Acting Secretary stated that the new service “will be offered only during the morning and evening peak travel times.”

Notwithstanding this limitation, BoltBus is offering service every half hour to an hour throughout the day from approximately 7:00 am until 8:30 pm along with some additional late night departures.³⁹ Were the Board inclined to allow the Fourth Amendment to remain in effect, it should limit BoltBus’ service consistent with the GLI request for approval. In this regard, it merits note that the Board recently decided that GLI and PPB would need to file a formal application under 49 U.S.C. 14302 to obtain approval of the Fifth Amendment to their Pooling

³⁹ See Busjunction, <http://busjunction.com>

Agreements, which would have allowed BoltBus to operate between Washington, DC and Philadelphia. See MC-F-20908, *Peter Pan Bus Lines, Inc. – Pooling – Greyhound Lines, Inc.* (served March 24, 2010). The Board acted on the basis that the 1997/1998 Pooling Agreements do not reach to that route. By seeking approval informally, as in the case of the Fourth Amendment, GLI tried to stretch the 1997/1998 Pooling Agreements too far. So too, GLI and PPB should not be permitted to stretch too far the April 2008 approval of the Fourth Amendment, if that approval is allowed to stand at all.

CONCLUSION

Pursuant to 49 U.S.C. § 722(c) and 49 CFR 1115.4, the Board has “general authority to reopen an administratively final action at any time based on material error, new evidence, or substantially changed circumstances.”⁴⁰ The Board’s predecessor has stated that a significant change in the economic and competitive conditions within an industry constitutes sufficiently changed circumstances to warrant the reopening of an administratively final action.⁴¹ Moreover,

⁴⁰ *New York Central Lines, LLC—Abandonment Exemption—In Berkshire County, Ma; In the Matter of a Request to Set Terms and Conditions*, Docket No. AB-565 (Sub-No. 3X) (served July 12, 2002) at 3; see also e.g., *Clean Truck Coalition, LLC—Pooling Application*, STB Docket No. MC-F-21034 (served Nov. 19 2009) at 5 (“Should circumstances materially change, any interested party may seek reconsideration or reopening of this decision by filing a petition with the Board.”); *Arizona Elec. Power Coop., Inc. v. Burlington N. & S.F. Ry. et al.*, Docket Nos. 41185, 42077 (served May 12, 2003) at 4 (“We may reopen a proceeding at any time because of ‘material error, new evidence, or substantially changed circumstances.’”) (citing 49 U.S.C. § 722(c) and 49 CFR 1115.4).

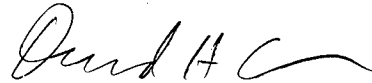
⁴¹ *Seaboard Air Line R.R. Co.—Merger—Atlantic Coast Line R.R. Co. Petition to Remove Traffic Protective Conditions*, 1992 ICC LEXIS 157 at *4 (served Aug. 3, 1992) (“FEC further argues that CSXT has not shown material error, new evidence, or substantially changed circumstances. Those are the general criteria in our rules (49 CFR § 1115.4) to support petitions to reopen administratively final actions. We disagree. Circumstances in the rail industry, as described in a section of the report in Traffic Protective Conditions, 366 I.C.C. 112, 115 (1982), appear to have changed substantially.”)

even if there were no dramatic changes, the Board has broad authority under Section 14302(e) to reopen an approved pooling agreement.

As discussed above, the dramatic changes in the intercity bus industry in the last several years and the success of independent competitors have made it clear that the reasons relied on to justify the original Pooling Agreements do not apply to BoltBus service. Further, Greyhound and Peter Pan have expanded operations of BoltBus beyond what was approved by the Board.

BoltBus has in fact become a major operator in the Northeast intercity market, and yet the Board has never been considered the propriety of the pooling arrangement under which it operates in light of the relevant facts and in a manner consistent with the Board's pooling application rules. Based on the facts presented in this Petition, Coach USA respectfully requests that the Board reopen the April 17, 2008 decision of its Acting Secretary allowing the Fourth Amendment to become effective and take appropriate actions to reconsider and disapprove that Amendment.

Respectfully submitted,



David H. Coburn
Frederick J. Horne
Christopher Falcone
STEPTOE & JOHNSON LLP
1330 Connecticut Ave., NW
Washington, DC 20036
(202) 429-8063
dcoburn@steptoe.com

Attorneys for Coach USA, Inc. and
Megabus Northeast LLC

May 3, 2010

EXHIBIT 1

LAW OFFICES
FRITZ R. KAHN, P.C.
EIGHTH FLOOR
1020 N STREET, N.W.
WASHINGTON, D.C. 20030-1001

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

March 25, 2008

Hon. Anne K. Quinlan
Acting Secretary
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Dear Secretary Quinlan:

This refers to STB Dockets No. MC-F-20904, No. MC-F-20908 and No. MC-F-20912, Peter Pan Bus Lines, Inc.--Pooling-Greyhound Lines, Inc., and the revenue pooling agreements between Peter Pan Bus Lines, Inc. and Greyhound Lines, Inc., and their amendments, as approved by the Board.

The applicants have further amended the revenue pooling agreements to provide an enhanced service over the pooled routes. A copy of the Fourth Amendment to Revenue Pooling Agreements is attached.

The provision of enhanced service over the pooled routes is a relatively minor, ministerial change which I believe comes within the scope of the Board's earlier approvals and, hence, requires no action by the Board. I hope you will agree. If, however, you are of the view that more formal action is required, please treat this letter as applicants' request for a supplemental decision approving the amendment, pursuant to 49 U.S.C. 14302(c)(2) and 49 C.F.R. 1184.1, et seq.

If you have any question concerning the foregoing or if I otherwise can be of assistance, please let me know.

Sincerely yours.

Fritz R. Kahn

enc.

cc: Jeremy Kahn, Esq.
Mark E. Southerst, Esq.

FOURTH AMENDMENT
TO
REVENUE POOLING AGREEMENTS

Peter Pan Bus Lines, Inc. of Springfield, MA ("Peter Pan") and Greyhound Lines, Inc. of Dallas, TX ("Greyhound"), having entered into Revenue Pooling Agreements (collectively the "RPAgreements") approved by the Board by Decisions entered in STB Docket No. MC-F-20904, Peter Pan Bus Lines, Inc. – Pooling-Greyhound Lines, Inc., served June 30, 1997, STB Docket No. MC-F-20908, Peter Pan Bus Lines, Inc. – Pooling-Greyhound Lines, Inc., served April 29, 1998, and STB Docket No. MC-F-20912, Peter Pan Bus Lines, Inc. – Pooling-Greyhound Lines, Inc., served February 12, 1998, first amended by the Agreement dated October 22, 1998, approved by Decision of the Board, served December 18, 1998, and next amended by Agreement dated July 12, 1999, acknowledged by the Board, Secretary Williams, to require no formal action of the Board, by letter, dated August 6, 1999, and next amended by Agreement dated March 19, 2004, submitted to the Board by letter dated March 19, 2004, with no action being taken by the Board,¹ desire to further amend the RPAgreements as follows:

WHEREAS, Peter Pan and Greyhound have successfully cooperated to operate pooled services over the regular routes described in the RPAgreements (collectively, the "Pooled Routes"); and

¹ A minor amendment to the Agreement approved in Docket No. MC-F-20912 was dated September 19, 2003, and submitted to the Board by letter, dated September 22, 2003, with no action being taken by the Board.

WHEREAS, Peter Pan and Greyhound desire to enhance their service over the Pooled Routes by offering a modified service under a new brand name (the "Enhanced Service") in addition to their existing service over the Pooled Routes:

NOW THEREFORE, Peter Pan and Greyhound agree to amend the RPAgreements, as amended, to govern the provision of the Enhanced Service as follows:

1. Each of the three RPAgreements shall be amended by adding a new Section 1.A as follows:

1A. Establishment of Enhanced Service Over Pooled Routes

a. In addition to the service over the Pooled Routes as described in Paragraph 1.a. above, the parties shall also operate the Enhanced Service, as described herein, which shall be governed by this Fourth Amendment.

b. The revenues from the Enhanced Service which shall be the subject of this Fourth Amendment (the "Enhanced Service Revenues") are the gross amounts received from the sale of tickets for the Enhanced Service through Greyhound's Internet-based ticketing system, walk up sales, or otherwise, and the imposition of any and all fees and surcharges related to such tickets.

2. Each of the three RPAgreements shall be amended by adding a new Paragraph 2.c. as follows:

c. For the Enhanced Service only, all tickets for transportation will be sold on ticket stock or other means bearing the brand name of the Enhanced Service through Greyhound's Internet-based ticketing system and delivered by the Internet-based ticketing system or by other appropriate means.

3. Each of the three RPAgreements shall be amended by adding a new Paragraph 3.g. as follows:

g. For the Enhanced Service only, Greyhound will operate all of the service over the Pooled Routes with buses bearing the brand of the Enhanced

Service and used exclusively for the Enhanced Service, from and to locations, according to schedules, and at prices to be agreed upon by both Peter Pan and Greyhound, as provided in Paragraph 4.d. Greyhound shall maintain records of the mileage it operates in the Enhanced Service and report the mileage operated to Peter Pan each month as a part of its monthly overall reporting to Peter Pan. Except as expressly provided in this Fourth Amendment, Greyhound's operation of the Enhanced Service over the Pooled Routes shall not be considered in any way in connection with the parties' rights or obligations or calculation of revenues under the RPAgreements for services other than the Enhanced Service.

4. Each of the three RPAgreements shall be amended by adding a new Paragraph section 4.d. as follows:

d. For the Enhanced Service only, as quickly as feasibly possible, the parties will jointly designate an "Operations Team" to be primarily responsible for the day-to-day operation of the Enhanced Service, subject to oversight by both Peter Pan and Greyhound management. The Operations Team will recommend initial pricing, schedules, and timetables, and from time to time thereafter shall identify the need for and recommend appropriate service adjustments, as it deems necessary, subject to approval by both Peter Pan and Greyhound management, and subject further to the right of either or both Peter Pan and Greyhound to request a meeting of senior management as described in Paragraph 4.b and/or to invoke arbitration as described in Paragraph 4.c., except that for purposes of pricing and issues relating to yield management, the parties' rights shall be defined by the RPAgreements, subject to the right of either party to request a meeting of senior management as described in Paragraph 4.b and/or to invoke arbitration as described in Paragraph 4.c. All expenses related to the hiring and employment of the Operations Team, shall be costs and expenses of the Enhanced Service as provided in Paragraph 7.c, except any adjustments to the initial salaries, bonuses, and/or other compensation to the Operations Team may be made only with the mutual agreement of both parties.

5. Each of the three RPAgreements shall be amended by adding a new Section 4.A as follows:

4A. Use and Ownership of the "Brand" for the Enhanced Service

a. Greyhound shall develop at its sole expense the Internet-based ticketing system for use in providing the Enhanced Service. All rights and ownership of intellectual property related to the ticketing system shall at all times remain solely with Greyhound or its respective owner if licensed by Greyhound.

Nothing in this Fourth Amendment shall prohibit Greyhound from using such ticketing system or the software related to it outside the Enhanced Service.

b. Greyhound shall at all times hold all rights and ownership of the logos, trademarks, service marks, and all other intellectual property rights related to the Enhanced Service's brand. Greyhound agrees that both parties may use such rights as described in this paragraph 4A.b. during the term of this Fourth Amendment in the performance of the Enhanced Service under this Fourth Amendment without any charge or fee for the use of such rights.

c. Nothing in this Fourth Amendment shall prohibit or limit Greyhound from using any of its brand-related rights associated with the Enhanced Service as described in paragraph 4A.b. immediately above in connection with the operation of bus service other than the Enhanced Service described in this Fourth Amendment during the term of this Fourth Amendment, except (i) neither party shall operate service substantially equivalent to the Enhanced Service between any of the points served under the RP Agreements, or over any portion of the routes within the areas described in the RP Agreements, without the advance written agreement of the other party; (ii) if during the term of this Fourth Amendment either party desires to operate a service substantially equivalent to the Enhanced Service which serves any one or more points served under the RP Agreements, then the other party shall be given an opportunity to participate in such additional service and both parties shall be required to negotiate in good faith for a period of ninety (90) days, or longer if agreed to by the parties in writing, to expand the new service under an arrangement similar to this Fourth Amendment. Provided however, the exact terms of such further expansion will be based on the routes operated by the parties, the capital investment, the resources to be committed by the parties and operating risk assumed by the parties as agreed to during the negotiation period, and (iii) if during the term of this Fourth Amendment either party desires to operate a service substantially equivalent to the Enhanced Service which does not include any points served under the RP Agreements, then the parties shall in good faith discuss the opportunity to participate in such service and the terms of such participation, if any.

6. Each of the three RP Agreements shall be amended by adding the following two sentences to the end of Paragraph 5:

For the Enhanced Service only, the Operations Team shall be responsible to investigate and endeavor to resolve claims arising from, the loss of, or damage to any baggage carried on the Enhanced Service, and Peter Pan and Greyhound shall cooperate in the investigations and resolution. All costs incurred in investigating and resolving baggage claims arising wholly from

operation of the Enhanced Service shall be costs and expenses of the Enhanced Service as provided in Paragraph 7.c

7. Each of the three RPAgreements shall be amended by adding a new Paragraph 7.c. as follows:

c. For the Enhanced Service only, and without regard to or in any way affecting the computation of Net Pool Revenue as provided in Paragraph 7.a., the "Net Enhanced Service Revenue" shall be calculated as provided in this Paragraph 7.c. From the Enhanced Service Revenues there shall be deducted costs and expenses related to the start-up, termination (if any), and/or day to day operations of the Enhanced Service, all as more specifically described in this Fourth Amendment, and the result will be the "Net Enhanced Service Revenues." The parties shall cooperate to prepare a schedule describing with particularity those costs and expenses related to the start-up and describing with particularity the methodology for calculating the direct and indirect costs and operational expenses of the Enhanced Service, which schedule is incorporated into this Fourth Amendment as the Enhanced Revenue Costs and Expense Schedule. If there should be any inconsistency between the terms of this Fourth Amendment and the Enhanced Revenue Cost and Expense Schedule as to those costs and expenses which shall be deducted from Enhanced Service Revenues, then the provisions in the Enhanced Revenue Cost and Expense Schedule shall control. The parties shall also agree in writing to both an "Operating Budget" and a "Capital Budget" for the operation of the Enhanced Service, with the first Operating Budget and first Capital Budget to be completed and agreed upon prior to the institution of the Enhanced Service and subsequent year's Operating Budget and Capital Budget to be completed and agreed upon not later than 30 days prior to the end of each of Greyhound's fiscal years. The Net Enhanced Service Revenue for each period shall be calculated by deducting from the Enhanced Service Revenue all costs and expenses during that same period according to the methodology in the Enhanced Revenue Costs and Expense Schedule with reference to the Operating Budget and Capital Budget, except that the portion of any cost or expense which varies more than \$2,000 per line item or 10% per line item from the Operating Budget or the Capital Budget shall be subject to review by both parties.

8. Each of the three RPAgreements shall be amended by adding the following sentence at the end of Paragraph 8.e.:

For the Enhanced Service only, Greyhound shall prepare and submit a report for the Enhanced Service to Peter Pan within five business days of its payment of Net Enhanced Service Revenues.

9. Each of the three RPAgreements shall be amended by adding a new Paragraph 8.f. as follows:

f. For the Enhanced Service only, each party shall receive 50% of the Net Enhanced Service Revenues. Greyhound will remit to Peter Pan its share of the Net Enhanced Service Revenues for the previous calendar month (including any adjustments from prior months), by wire transfer to a designated bank account or other similar means not later than the 25th day of the following month. Peter Pan will reimburse Greyhound promptly for any overpayment of Net Enhanced Service Revenue that is determined by the monthly adjustment.

10. Each of the three RPAgreements shall be amended by adding a new Section 8.A as follows:

8A. Working Capital

Each party agrees to provide 50% of the working capital required to fund the operations, expenses, and liabilities of the Enhanced Service consistent with the Capital Budget and Operating Budget. Prior to the commencement of the Enhanced Service, the parties will agree in writing on an initial Capital Budget and Operating Budget. The capital requirement for the on-going operation of the Enhanced Service and the time for contributions by the parties of that amount will be determined jointly in writing by Greyhound and Peter Pan as a part of the periodic preparation of the Capital Budget and Operating Budget, for however long the parties jointly agree additional working capital may be required. Each party agrees to contribute 50% of the amount agreed upon in the Capital Budget and Operating Budget at mutually agreeable times. Either party may set off, distribute, or transfer funds collected or held on behalf of the other party from the RPAgreements and use such funds to satisfy the other party's working capital obligations.

11. Each of the three RPAgreements shall be amended by adding a new Paragraph 10.c. as follows:

c. For the Enhanced Service only, Greyhound will be considered to be the "Operator" for all purposes of this Paragraph 10. With respect to the Enhanced Service, Greyhound will investigate, resolve, and/or defend claims alleged to have arisen from the Enhanced Service in cooperation with the Operations Team. For buses used exclusively in the Enhanced Service, expenses

ordinarily associated with the operation of such a bus, including expenses relating to (i) inspecting a bus, (ii) operation of the bus in accordance with the requirements of Federal, state, or local laws, ordinances, or regulations, (iii) all repairs, service and preventative maintenance as are necessary to ensure the safe and efficient operation of the bus, (iv) the operator of the bus, (v) any replacement or rental buses, (vi) any taxes, including highway use taxes, sales taxes, and property taxes assessed against that bus, (vii) all required licenses and permits, (viii) all fuel and lubricants, including related taxes, (ix) comprehensive insurance, and (x) any road calls shall all be costs and expenses of the Enhanced Service as provided in Paragraph 7.c. In addition, all lease, interest, and finance charges incurred by Greyhound in the lease of buses to be used exclusively in the Enhanced Service shall also be costs and expenses of the Enhanced Service as provided in Paragraph 7.c. For purposes of Greyhound's general and automobile liability insurance, the costs and expenses of the Enhanced Service for such insurance shall be limited to only a fixed dollar amount per bus, agreed to by the parties in writing at the beginning of each year of operating the Enhanced Service and at the beginning of each year thereafter. Any increases in the fixed amount per bus for subsequent years shall be justified by Greyhound but, in no event shall any such annual increased per bus amount be greater than 20% in excess of any commercial insurance quote Peter Pan could obtain to cover a service equivalent to the Enhanced Service unless agreed to in writing by the parties.

12. Each of the three RPAgreements shall be amended by adding the following sentence at the end of Paragraph 16:

For the Enhanced Service only, the parties also acknowledge that Fourth Amendment to the RP Agreements may be subject to the jurisdiction of the Surface Transportation Board, and so this Fourth Amendment shall not become operative until approved or authorized by the Board.

13. Each of the three RPAgreements shall be amended by adding the following sentence at the end of Paragraph 18:

For the Enhanced Service, the term of the agreement relating to Enhanced Service shall be the same as the term of the RPAgreements, except as expressly provided in this Fourth Amendment.

14. Each of the three RPAgreements shall be amended by adding a new Paragraph 22.d. and a new Paragraph 22.e. as follows:

d. For the Enhanced Service only, the parties acknowledge the Enhanced Service, by nature of its distinct brand and unique service features, is a new service whose future viability is not known. Therefore, at any time during the period beginning on the one year anniversary of the institution of the Enhanced Service and ending on the second year anniversary of the institution of the Enhanced Service, either party may advise the other of its intent to discontinue cooperating in the operation of the Enhanced Service under this Fourth Amendment no less than 120 days prior to the effective date of its discontinuance. If either party terminates this Fourth Amendment pursuant to the terms of this Paragraph 22.d., the parties will make a final accounting of Enhanced Service Revenues and Net Enhanced Service Revenues, and each party's contribution of working capital as of the date of termination of the Enhanced Service, and any monies owed as a result of this final accounting will be paid the party to whom owed within 30 days of the completion of the final accounting. As a part of such final accounting, it is agreed that neither party shall have any obligation of any nature for the costs of buses acquired by the other party to operate the Enhanced Service, except for (i) the periodic payments as provided in the Enhanced Revenue Costs and Expense Schedule during the period the Enhanced Service was operated and (ii) the non-terminating party may elect to purchase the branded coaches utilized in providing the Enhanced Service from the terminating party. The price of such sale to be based the most recently published Average Low Retail value of similar Make/Model coaches in the "The Official Bus Blue Book". All coaches will be sold "AS IS WHERE IS" with tires.. This provision does not apply to service over the Pooled Routes under the RPAgreements.

e. In the event of termination pursuant to Paragraph 22.d, the non-terminating party may elect to continue to operate the Enhanced Service over the Pooled Routes. For a period of one (1) year after termination. (i) each party agrees to continue providing maintenance and operational support as per the Enhanced Revenue Costs and Expense Schedule in effect at the time of termination, (ii) Greyhound will allow Peter Pan to utilize the brand name of the Enhanced Service for a fee equal to one and one-half percent (1.5%) of the actual Enhanced Service Revenues collected by Peter Pan, such use limited solely to the Enhanced Service over the Pooled Routes in effect at the time of termination, and (iii) Greyhound will allow Peter Pan to utilize its internet ticket system for a fee equal to the ticketing transaction fee currently in effect at the time of termination. After the one-year period, the parties will negotiate in good faith on changes to the rates and fees, if any.

16. Except as expressly provided herein, this Amendment Four shall not in any way affect the rights and obligations of the parties with respect to service

over the Pooled Routes under the RPAgreements. Except as expressly modified by the provisions of this Fourth Amendment, the parties intend that all terms and conditions in the RPAgreements shall continue to apply to this Fourth Amendment with full force and effect. In the event of a conflict between any provision of the RPAgreements and any provision of this Fourth Amendment, the provision of this Fourth Amendment shall control with respect to the Enhanced Service, and the provision of the RPAgreements shall control with respect to other service over the Pooled Routes.

17. Each party represents that this Agreement has been duly executed by an authorized representative empowered to bind such party.

IN WITNESS WHEREOF, the Parties have entered into this Fourth Amendment on this ____ day of March, 2008.

PETER PAN BUS LINES, INC.

GREYHOUND LINES, INC.

By: _____

By: _____

Name: _____

Name: _____

Title: _____

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Date: _____

PAW DOKETS
FRITZ R. KAHN, PC
FIGHTER BOOK
1220 S. RILEY NW
WASHINGTON, DC 20005-1509
202-293-1152
FAX 202-341-0300
fritz@fritzrka.com

April 2, 2008

VIA ELECTRONIC FILING

Hon. Anne K. Quinlan
Acting Secretary
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Dear Secretary Quinlan:

221971 This letter is intended to supplement my letter, dated March 25, 2008,
transmitting the Fourth Amendment to the revenue pooling agreements between Peter
Pan Bus Lines, Inc., and Greyhound Lines, Inc. approved by the Board in STB Dockets
No. MC-F-20904, No. MC-F-20908 and No. MC-I-20912. Peter Pan Bus Lines, Inc. --
Pooling--Greyhound Lines, Inc. and their amendments 221983

221981 I stated that the Fourth Amendment was intended to permit enhanced service over
the pooled routes. The enhance service contemplated by the Fourth Amendment is
designed to permit Peter Pan Bus Lines, Inc. and Greyhound Lines, Inc. more effectively
to compete with the so-called Chinatown bus operators, rendering service principally
between Washington and New York and between New York and Boston. The Chinatown
bus operators do not operate from terminals but from convenient curbside locations and
do not offer service during the days but only at morning and evening peak travel times

BoltBus introduced by Greyhound Lines, Inc. last week will operate similarly,
and pursuant to the Fourth Amendment such operations will inure to the benefit of both
Peter Pan Bus Lines, Inc. and Greyhound Lines, Inc.

If you have further questions about the enhanced service proposal please get back
to me.

Sincerely yours.

Fritz R. Kahn

EXHIBIT 2



Office of the Secretary

Surface Transportation Board
Washington, D.C. 20423-0001

April 17, 2008

Fritz R. Kahn, Esq.
Eighth Floor
1920 N Street N.W.
Washington, DC 20036-1601

Dear Mr. Kahn:

This is to acknowledge receipt of your filing on March 25, 2008, as supplemented on April 2, 2008, of a copy of the Fourth Amendment to the Revenue Pooling Agreements in Peter Pan Bus Lines, Inc.—Pooling—Greyhound Lines, Inc., STB Docket Nos. MC-F-20904, MC-F-20908, and MC-F-20912.

According to your filing, the parties plan to provide enhanced service over their pooled routes between Washington, DC, and New York, NY, and between New York and Boston, MA, to compete with other bus operators. This new service will operate from curbside locations rather than from terminals and will be offered only during the morning and evening peak travel times.

Having reviewed the Fourth Amendment and the supplemental filing, it appears that this change to the Revenue Pooling Agreement falls within the scope of the Board's prior authorizations in these proceedings and no formal Board action is needed. While this newest amendment to the Revenue Pooling Agreement does not require Board action, we trust that the parties to the pooling agreement will work with affected states and localities to minimize any safety or traffic congestion problems that can sometimes be associated with bus operators picking up and discharging passengers at locations outside of established terminals.

Sincerely,

Anne K. Quinlan
Acting Secretary

EXHIBIT 3

The Return of the Intercity Bus:
The Decline and Recovery of Scheduled Service to
American Cities,
1960 - 2007



School of Public Service Policy Study



Chaddick Institute for Metropolitan Development
243 S. Wabash Avenue
Chicago, Ill. 60604

December 24, 2007

Joseph P. Schwieterman, Ph.D., Professor*
Lauren Fischer, Project Coordinator
Sara Smith, Research Data Coordinator
Christine Towles, Research Associate

Contact:

jschwiet@depaul.edu
312/362-5732 office

* Professor, School of Public Service and Director, Chaddick Institute

Executive Summary

This study assesses the changing status of intercity bus service throughout the United States between 1960 and 2007. Drawing on data from more than 5,000 arrivals and departures in a representative sample of American cities, it shows that U.S. cities lost nearly one-third of their scheduled intercity service between 1960 and 1980 and more than half of the remaining services between 1980 and early 2006. Although commuter-bus and charter-bus business expanded greatly during this period, most regularly scheduled intercity service disappeared. Many consumers considered the remaining service to be a travel option of last resort.

Nevertheless, the study's findings show that the intercity bus sector began to reassert itself in the transportation market later in 2006. By late 2007, the sector was enjoying a significant rebirth and was expanding throughout the country at the fastest rate in more than 40 years. Today, growth by low-cost carriers such as Megabus and the renewed strength of Greyhound and other conventional lines suggests that demand is expanding appreciably. Coincidentally, this resurgence is taking place during the twenty-fifth anniversary year of intercity bus deregulation in the United States.

1. Introduction

From Greyhound and Trailways to myriad “mom and pop” lines serving rural towns, intercity bus companies have been a ubiquitous part of the American transportation scene since the early twentieth century. For generations, “Thank You for Going Greyhound” was a slogan familiar to both the rich and poor. In many cities, the local bus station was the only business open around-the-clock. Even communities with populations of less than 100,000 once boasted bus stations with dozens of arrivals and departures daily.

But the intercity bus sector slumped in the 1960s in response to the decline of central cities, improvements to other modes of transportation, and rising household incomes. By the mid-1970s, the number of passengers using scheduled bus services was falling precipitously, and the industry’s image was fast deteriorating.

This study examines the changing levels of scheduled intercity bus service in U.S. cities to offer a new perspective on the industry’s changing role. Using newly collected data about the arrivals and departures of bus lines, the study’s findings illustrate the extent to which cities lost service between 1960 and 2006. Yet the findings also show that this sector began to experience a turnaround roughly 18 months ago. By late 2007, intercity bus service was in the midst of a significant recovery.

This year, for the first time in more than 40 years, regularly scheduled intercity bus service grew appreciably both in the eastern and in the western sections of the country, a trend that coincided with notable improvements in the speed and quality of service and which also occurred, by chance, during the twenty-fifth anniversary year of intercity bus deregulation. Our research shows that this growth is being driven by improvements in service and strong consumer demand. As a result, more growth will likely occur in the years ahead.

One noteworthy feature of our study is our review of data on more than 5,000 regularly scheduled arrivals and departures of intercity bus companies in a representative sample of cities in the continental United States. Because previously collected information was not in electronic form, we extracted information from printed bus timetables, eliminated duplicate entries, and entered this information into a data set that allowed us to evaluate the changing levels of service systematically. (We describe the characteristics of this data set in greater detail in the appendix.)

Our analysis is organized into four parts. Section II offers background and perspective. Section III focuses on the study’s relevance. Section IV evaluates the

industry's decline through 2005, and Section V examines the industry's recent resurgence.

II. Background Perspective

A half-century ago, when most communities with more than a few thousand residents had intercity bus routes radiating from town like spokes on a wheel, *Russell's Official National Motor Coach Guide*—stretched to 800 pages and contained nearly all the bus schedules of the 406 carriers operating in North America. A fleet of more than 20,000 buses traversed some 300,000 route-miles in service. More than 15,000 communities, including scores of small towns and rural areas, had access to at least one scheduled carrier.

Travelers held the Greyhound in high regard when the carrier named the black-and-white dog serving as its mascot “Lady Greyhound” in 1959. Indeed, in many cities, the company boasted spacious and modern depots with architecture that mirrored its streamlined “Americruisers”. In the largest cities, the carrier's depots kept dozens of arrival and departure bays, restaurants, and ticket counters busy around the clock. The average American traveled several hundred miles on intercity buses annually.

The federal government, considering bus service akin to a public utility, controlled how carriers entered and exited interstate routes and regulated the prices they charged. State governments enforced similar regulation for *intrastate* carriers. Most major cities relied heavily on intercity bus operators for both long-distance travel and for linking distant suburbs to the central city.

Falling on Hard Times

By the end of the 1960s, the tide was turning against the intercity bus business. The opening of interstate highways, increased automobile ownership, and the deterioration of downtown business districts in major cities all weakened the demand for intercity bus services. By the mid-1970s, the rate of car ownership in the United States had risen to more than 80 percent and airlines were experimenting with steeply discounted fares. Also, there was a significant decline in bus travel by women who were from middle-income households and who traveled alone, a demographic category that once accounted for a large share of the bus industry's business.

The industry's partial deregulation, which occurred upon passage of the Bus Regulatory Reform Act on September 22, 1982, provided relief from most federal controls on pricing and routes as well as gave carriers a mechanism to appeal regulations imposed upon them by state governments on intrastate routes. However, unlike the airline, truck, and rail freight sectors, which saw dramatic traffic increases after deregulation, the act failed to resurrect intercity bus traffic.

Some argue that regulatory reform came too late for the sector to overcome its tarnished image. Increasingly, ridership on buses consisted of minority groups and

lower-income passengers who could not afford to travel by other means. Regional lines suffered the most and were abandoned or assimilated into publicly owned transit companies.

Although commuter-bus and charter-bus business flourished in the 1980s and traffic on some intercity routes, such as the Northeast Corridor, remained strong, regularly scheduled service to points outside of major metropolitan areas suffered greatly from rising labor and fuel costs as well as expansion by Amtrak. Making matters worse, Greyhound faced worsening labor-management strife that culminated in several strikes, causing further damage to its public image. The carrier attempted to strengthen its competitive position by making improvements to buses and facilities and by acquiring rival Continental Trailways in 1987. Three years later, however, it entered bankruptcy.

Greyhound successfully reorganized, but neither this struggling giant nor the smaller operators feeding it shared appreciably in the passenger-traffic boom that benefited the airlines, Amtrak, and charter-bus operators in the 1990s. Changes in travel behavior after the terrorist acts of September 11, 2001 appeared to bode well for the industry, but soon more cutbacks were underway. In 2004, Greyhound began another round of major cuts that continued through late 2005. Ultimately, the carrier eliminated nearly 1,000 communities from its route map.

Signs of a Revival

In 2006, the outlook for the intercity bus at last began to improve. Rising highway congestion made automobile driving more stressful and unpredictable than before. A sharp escalation in the price of oil, which pushed gasoline prices above \$3 per gallon, and the economic rebound of central business districts in major cities, encouraged travelers to reconsider the bus. Consumer disenchantment with air travel, attributable to overcrowded terminals, air-traffic delays, and rigorous security processes, made bus travel seem relatively more attractive, especially on short and medium distance routes.

The recovery began slowly but was fueled by a new breed of bus operators, some of which accepted bookings only on the Internet. As explained in Section IV, Megabus emerged in the Midwest and West, while Apex, DC2NY, and other carriers expanded in the East. Sensing the timing was right for large-scale investments, Greyhound completed a \$60 million overhaul in late 2007.

But has the regularly scheduled intercity-bus industry really rebounded? As we note in the following section, previously-published research has suffered from a paucity of reliable data about the scale of intercity bus operations and passenger traffic.

III. Need and Timeliness of This Study

The social and economic forces that reduced the role of the intercity bus industry are widely documented in the literature (Walsh, 2000; General Accounting Office, 1992;

and Federal Transit Administration, 2002). Analysis of this sector, however, has been hampered by the absence of data on the number of fare-paying passengers and the changing level of service. All available national passenger statistics are consolidated with certain commuter- and charter-bus statistics, making it impossible to isolate changes in conventional intercity bus use.¹ By contrast, passenger statistics for the air and rail industries are accurately categorized, available, and evaluated in great detail.

As a result of measurement problem, previous research on the changes to the intercity bus network tended to focus on the number of communities served or on changes in route-mileage. These measures, while useful, do not adequately answer the question of how much the amount of service provided by intercity bus lines has changed.

In 1992, the General Accountability Office attempted a systematic evaluation of changes in ridership since the 1960s. The study showed that traffic declined from 140 million passengers to 40 million in 1990. Nevertheless, the authors acknowledge that their estimates are far from perfect due to significant changes in ways carriers are categorized.² Moreover, there has apparently not been any subsequent attempt to estimate the ridership changes.

The absence of data on the number of paying passengers adds to the importance of reviewing published schedules to assess the extent of the industry's decline and factors contributing to its recent recovery. We provide such analysis in the following section.

IV. Key Findings

Our review allowed us to make four principle conclusions. As shown in the appendix, our focus is on available service through a representative sample of cities across the country at six points in time.

Finding I. The amount of intercity bus service in American cities dropped by nearly one-third between 1960 and 1980. A reduction in service occurred in all parts of the country, including areas experiencing rapid economic growth.

Cities in the United States, our analysis suggests, experienced an estimated 30.9 percent loss in service between 1960 and 1980. (The margin of error associated with our estimate is +/-3.3 percent). The total number of weekday operations encompassed by our data set fell over this period from 1,862 to 1,286, respectively, while the share of departures accounted for by Greyhound dropped from 66 to 64, respectively (Table 1).

Table 1
Change in Number of Scheduled Arrivals and Departures
American Cities, 1960 – 2002

Experience of Selected Cities	Daily Buses			Percent Change	
	<u>1960</u>	<u>1980</u>	<u>2002</u>	<u>1960-80</u>	<u>1980-2002</u>
Chicago, Ill.	454	290	147	-36.2%	-49.3%
El Paso, Tex.	89	64	45	-28.1%	-27.9%
Kansas City, Mo.	165	117	38	-29.1%	-67.5%
Portland, Ore.	127	102	58	-19.7%	-43.1%
National Average	1,862+	1,286+	635+	-30.9%	-50.6%
Error Margin				+/-3%	+/-4%
Annual change (compounding)				-1.4%	-1.9%

+ denotes number of observation in data set for this year.

In the 1960s, the number of intercity arrivals and departures exceeded that of commercial airlines as well as passenger railroads in major cities by a substantial margin. By the 1980s, most of the trains had been discontinued, but the number of departures by commercial airlines grew to such an extent that it generally exceeded the number of intercity bus departures by a factor of two.

Not all cities suffered to the same degree. In Chicago, the largest city in our sample, service dropped from 454 departures to 290 during this interval, a 36.2 percent decline. Chicago continued to be home to the country's largest station operated by Greyhound, but the carrier's daily activity there dropped from 287 to 186 buses. The loss of service, in percentage terms, was even greater in Charleston, South Carolina, and Columbus, Ohio, which witnessed declines of 59 and 71 percent, respectively, but generally much smaller in cities farther west, such as El Paso and Kansas City.

Much of the decline observed during this period was attributable to the declining viability of neighborhoods near major bus stations. The construction of the interstate highway system, of course, also contributed to the sharp reduction in service. Adding to the industry's problems, many companies concurrently faced significant cost escalation.

Finding II. The decline of service greatly accelerated after 1980, leaving many metropolitan areas with populations of more than a million with fewer than a dozen daily departures. By 2002, the number of intercity bus operations was less than a third of what it had been in 1960.

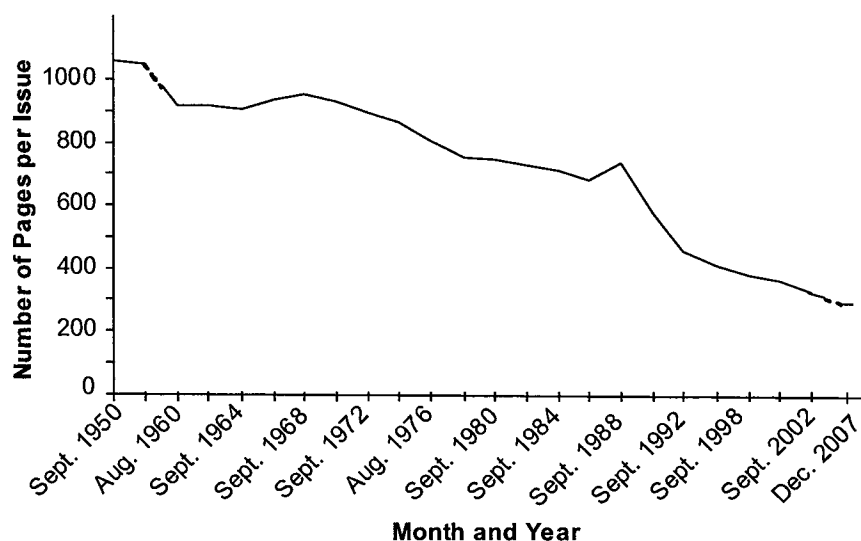
We estimate that there was a 50.6 percent decline in scheduled service between 1980 and 2002. (The margin of error associated with our estimate is 4.4 percent). Cleveland, Kansas City, and Sacramento, which all had more than 150 daily bus operations at the start of the period, saw the number of daily buses diminish to 64, 38, and 53, respectively. Louisville, Ky., lost nearly 75 percent of its service over this interval. The annual compounding rate of decline accelerated from 1.4 percent during the previous period to 1.9 percent.

The intercity bus network diminished after 1980 in a manner similar to that of the country's passenger-train network a quarter-century before. Higher-income travelers turned to other modes of transportation, and competition from airlines intensified. (Bus lines, which focused more heavily on short-distance routes and lower-income passengers than rail lines, did not feel the effects of airline competition as early as the railroads). As the system withered, many travelers came to expect service to be unreliable and stations to be decrepit and unsafe.

By the late 1980s, it was clear that deregulation in 1982 had failed to halt the industry's decline. The lifting of regulations resulted in changes that helped the industry lower costs and bolster efficiency, but the largest carriers used the freedoms provided to further rationalize their networks. Prior to deregulation, there had been a tendency for carriers to reduce frequency on routes rather than to eliminate routes entirely. After deregulation, conversely, it became commonplace for cities to face wholesale reductions in the number of routes. In many instances, carriers "spun off" lightly used routes to smaller operators, which in some cases discontinued service only a few years later. As a result, the intercity bus system ceased to be truly comprehensive.

The enormity of these traffic losses are reflected in the diminishing size of the Russell's Guide (see Figure 1). The number of pages devoted to timetables and traveler information by bus companies fell from 880 in 1960 to 260 in 2002. Currently, the Guide has just 242 pages of such information.

Figure 1
Diminishing Size of Russell's Motor Coach Guide
 Pages Devoted to Carrier Information and Timetables



Finding III. The industry's number of departures continued to shrink through early 2006, largely due to Greyhound's heavily publicized cuts. The shift away from air travel after the 9/11 terrorist attacks failed to halt the industry's long-term decline.

Despite the added cost and complexity of airline travel engendered by the 2001 terrorist acts, the intercity-bus sector did not enjoy appreciable expansion over the next four years. Conversely, Greyhound suffered terrorism scares of its own and experienced several heavily publicized accidents. By 2004, Greyhound was in the midst of another round of heavily publicized cuts, reductions of more than 20 percent in the number of daily buses in some cities. Yet there were also signs of an impending turnaround. Some cities were beginning to see modest increases in service, apparently for the first time in years.

We estimate the amount of service available in cities dropped by another 32 percent between early 2002 and early 2006 (the margin of error is +/- 4 percent). It should be noted, however, that despite the size of this percentage estimate, the reductions during this period involved far fewer buses than in previous periods due to the industry's diminished size. Most of the decline was attributable to the elimination of service by Greyhound, which saw traffic drop from 21.2 million in 2004 to 19.3 million in 2006.³

Table 2
Change in Number of Scheduled Arrival and Departures
American Cities, 2002 – 2007*

Experience of Selected Cities	Daily Buses			Percent Change	
	<u>2002</u>	<u>2006</u>	<u>2007</u>	<u>2002-06</u>	<u>2006-2007</u>
Cleveland, Ohio	64	45	47	-29.7%	+4.4%
Louisville, Ky.	20	24	25	+20.0%	+4.2%
Minneapolis, Minn.	42	30	39	-28.6%	+30.0%
Sacramento	45	29	26	-47.2%	-6.9%
National Average	635	422	481	- 36.1%	+13.0%
Error Margin				+/- 3%	+/- 4%
Annualized change				-8.0%	+7.6%

+ denotes number of observation in data set for this year.

* Compares February 2002, February 2006 and December 2007

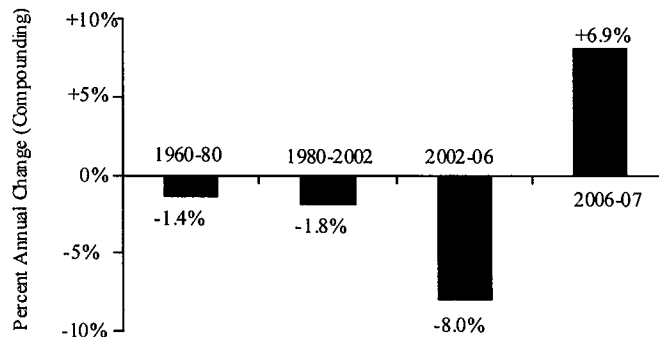
These findings may overstate the decline in service due to the unmeasured effects of bus companies that operate in the “gray areas” of the law, mostly notably those linking Midtown Manhattan and the Chinatown district in Washington, D.C. These carriers, which are not listed in the Russell's Guide, frequently change their schedules and in some cases operate in violation of safety laws. Needless to say, these so-called “Chinatown bus” operators do not report passenger statistics or issue printed timetables. Our estimates also exclude commuter-bus and certain suburban-bus operators, which expanded markedly during this period.

Nevertheless, the intercity bus network shrunk markedly throughout the country between 2002 and 2006. During this period, the intercity bus network reached its nadir.

Finding IV. A modest recovery began in early 2006 and gradually gathered momentum. By 2007, for the first time in more than 40 years, the level of service on the East Coast, in the Central States, and on the West Coast was growing significantly, largely due to the emergence and expansion of low-cost operators.

Our analysis suggests that the volume of service in cities in the sample increased by 13.0 percent between early 2006 and December 2007, with an error margin of 3.3 percent. Cities experiencing gains outnumbered those experiencing losses by a ratio of roughly three-to-one. The annual rate of growth during this period, shown in Figure 2, illustrates the extent of this turnaround.

Figure 2
Changing Level of Intercity Bus Service
Percentage Annual Growth or Decline



The 6.9 percent annual growth rate, compared to an 8 percent annual rate of decline during the previous period, was largely attributable to a new breed of motor-coach operators operating without conventional terminals, generally leaving from curbside locations or public-transit facilities. (These carriers typically do not publish timetables in the Russell's Guide). The expansion was especially noteworthy in three areas:

1. Megabus. The largest and best-known of these operators, Megabus, a subsidiary of Coach USA (owned by Stagecoach, Ltd., a British company) opened its Chicago hub on April 10, 2006. The hub initially consisted of 32 daily buses (16 roundtrips) between eight Midwestern cities: Chicago, Cincinnati, Columbus, Detroit, Indianapolis, Milwaukee, Minneapolis, and St. Louis.

In 2007, Megabus expanded service at its Chicago hub to 42 daily bus operations and added service to Kansas City and several intermediate stops on other routes. In August 2007, it added service to 12 cities in Arizona, California, and Nevada, including Las Vegas, Phoenix, and San Francisco, from a new hub in Los Angeles.

2. New East Coast and West Coast Operators. A variety of carriers expanded in coastal areas. DC2NY Bus began service between New York City and Washington, D.C. in mid-2007 while differentiating its product with wireless Internet service and other

amenities. Apex Bus Lines, which operates a route system emanating from New York City, more than doubled its bus operations to 100 daily departures over this period, adding service to points as far away as Atlanta.

In addition to Apex, other so-called “Chinatown carriers” expanded as well. In 2006, two new carriers, Vamoose and Washington DeLuxe, began operating from Midtown Manhattan to other points in the Northeast. USAsia sprung up on the West Coast, offering service between the Chinatowns in Reno, the San Francisco Bay Area, Los Angeles, the San Gabriel Valley and Las Vegas. Once serving primarily immigrants and other travelers with extremely tight budgets, these types of operators are now reaching a more diverse clientele.

3. Expansion by established carriers. Established operators, including Peter Pan Bus and Bonanza Bus Lines also expanded service on certain routes during this period, and Greyhound has held its number of departures constant for the first time in years. In several cities, such as Chicago and Minneapolis, the expansion of Megabus more than offset the service reductions that Greyhound and other carriers made over the previous five years.

Finding V. The demand for intercity bus service between cities is growing robustly, suggesting that further expansion will occur in 2008.

In addition to the expansion of scheduled service, there is growing evidence that the revival of the bus industry is being propelled by rising consumer demand, which is manifesting itself in at least three ways.

1. Traditional carriers, such as Greyhound, are reporting a significant increase in ticket sales. Conventional intercity bus lines are benefiting from the same factors that have contributed to robust growth in short- and medium-distance Amtrak traffic in recent years. These factors include high fuel prices, rising traffic congestion, and the resurgence of central-business districts. Travelers too young to remember the stigma associated with bus travel, especially those living on college campuses and in large cities, are turning to motor coaches in especially large numbers.

Amtrak has recorded 10 percent growth in traffic on such routes since 2006—growth similar to that recently reported by Greyhound, which has disclosed that ticket sales, expressed on a per-bus-departure basis, have increased 15 to 20 percent since completing its heavily publicized cuts in 2005. Peter Pan, the largest operator in New England, also reports double-digit growth in ticket sales on nearly all of its routes. According to the American Bus Association, smaller regional operators have also experienced a significant increase in demand.⁴

2. Rising demand is encouraging low-cost carriers such as Megabus and various East Coast operators to add capacity to existing routes. Demand has been strong enough so that Megabus is in the process of putting into service 17 double-deck buses, which

have the capacity to carry 79 passengers, on its Midwestern routes. The carrier's low promotion fares, which start at \$1 per trip, have helped build product awareness.

Megabus handled more than 500,000 passengers in its first 15-months of operation, and has seen sharply increased quarterly traffic since launching its Los Angeles hub. During the Thanksgiving holiday period in 2007, the carrier operated several dozen extra buses at its Chicago hub in response to strong bookings.

3. The industry is engaged in more aggressive marketing than in previous years and reaping the benefits of persistently high fuel costs. After years of relative passivity in advertising and promotion, the intercity bus sector is becoming more creative and aggressive in these areas.

In autumn 2007, Greyhound announced the completion of a \$60 million product overhaul, in which it refurbished 970 buses and upgraded 125 stations with plasma screen televisions, new signage and renovated bathrooms. The carrier also added "greeters" to major stations to improve the level of customer service. Greyhound concurrently launched its first national advertising campaign in years, which includes spots on national television and print ads in major national entertainment magazines.

The American Bus Association reports that the "Megabus Effect"—i.e., rising product awareness attributable to that carrier's service, advertising, and steeply discounted fares—is benefiting the entire industry. In December, Megabus launched a heavily publicized promotion, giving away 100,000 free tickets as part of a campaign to build awareness that it is an environmentally friendly ("green") travel choice. A motor coach that is three-quarters full achieves more than 250 passenger-miles per gallon of fuel—several times the energy efficiency of airplanes or cars.

V. Conclusion

During this twenty-fifth anniversary season of intercity bus deregulation, the sharp recovery in service might begin a long-term shift toward increased motor coach travel on routes operating outside of major metropolitan areas. A minibuss service, Shuttle Express, for example, will begin offering door-to-door service between Portland and Seattle on January 15, 2007, with wireless Internet service, television monitors, and other amenities. Megabus is studying the possibility of adding more cities to its system, and several new operators are poised to launch service in the near future.

The jury is still out on whether more people other than the low-income will take the bus on trips more than a few hundred miles or between small cities, where traffic congestion is not an issue. Greyhound probably has little chance of winning back many affluent travelers anytime soon. The image of intercity bus lines, however, is clearly on the mend.

Yet the industry faces vexing roadblocks to expansion. Little is known about the profitability of Megabus or other low-cost operators. Regulation still discourages private

operators from freely entering certain intrastate routes. Another problem is the slow pace of creating expressway lanes for high-occupancy vehicles on congested routes within major metropolitan areas, a move that would afford priority to long-distance buses and other high-capacity vehicles.

There is also concern over the practice some companies have of using curbside locations next to Amtrak or transit terminals rather than paying for station facilities. This has given rise to allegations that the companies are “free-riding” off the investments of others. A lawsuit filed by Peter Pan bus lines actually forced one local bus line to change the location of its Boston station.

Nevertheless, during this anniversary season of intercity bus deregulation, it is noteworthy that the intercity bus is again off and running—and regaining respectability among the traveling public.

Technical Appendix

The authors collected information for published bus schedules over a five-month period primarily by consulting editions of “Russell’s Official National Motor Coach Guide” published between 1960 and 2007. Overall, data-collection required about 250 hours of research time, most of which was conducted at DePaul University and the Transportation Library at Northwestern University. Due to errors in the Official Guide for Greyhound Lines in 2005 and 2006, the research team used data from printed Greyhound timetables dating to that period.

The research team collected arrival and departure information on all routes operating through twelve cities: Charleston, SC., Chicago, Ill., Cleveland, Ohio, Columbus, Ohio, El Paso, Texas, Evansville, Ind., Kansas City, Mo., Louisville, Ky., Minneapolis, Minn., Portland, Ore., Providence, R.I., and Sacramento, Calif. The information was then organized into a panel (cross sectional time-series) data set. For each bus operation, we recorded: i) the name of the carrier, ii) the bus number (or arrival and departure time if there was no bus number shown), iii) the timetable number (route), iv) whether the bus originated in a community or was part of a through route, v) the days of the week of operation. The numbers shown throughout this volume represent the total number of weekday (Monday) departures.

The methodology included research to assure that any one arrival or departure was not counted more than once, as some buses are listed in more than one of the sequentially numbered timetables in the Russell’s Guide. In instances where buses were not numbered, the itinerary of the bus was examined to identify duplicative entries. Roughly 20 percent of all arrivals and departures in cities were listed in more than one table in the Guide. As a result, the number of arrivals and departures in the data set was reduced from about 6,400 to 5,200.

The propensity for intercity carriers to be absent from the Official Guide was not a significant problem prior to 2005: only the smallest carriers (as well as carriers not relevant in our analysis, such as commuter-bus companies) tended to be absent. The severity of this problem, however, grew after the emergence of low-cost operators in the Northeast in the early 2000s, and grew further when Megabus (which does not publish its schedules in printed form) launched service in the Midwest in 2006. We handled the problem by adjusting our numbers to include these carriers in our frequency numbers.

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¹ The amount of service provided by intercity bus operators in American cities from 1960 to the present day is not easily quantifiable in the same way as the amount of airline travel. Whereas airlines routes rarely consist of more than four or five segments, some bus trips involve more than 30 segments, some of which are only a few miles apart, making analysis by city-pair difficult. There is also a propensity for bus companies to operate services without giving each departure a distinct numbers, which adds to complexity of assembling a data set.

Although other sources, such as the American Bus Association, provide extensive statistics about intercity bus travel, their numbers include passengers handled on certain non-scheduled bus trips as well as commuter operators. These numbers generally overstate the traffic handled by the regularly scheduled intercity network and, indeed, show almost continuous traffic growth since 1980.

² The authors note that the estimates in the USGAO were derived from three separate sources and that these estimates include only Class I bus lines. The revenue threshold that carriers needed to meet to be in this category, however, changed over the period, which the authors note affected the accuracy of their results.

³ Data provided by Greyhound, Inc., on December 17, 2007.

⁴ Interview by the author with American Bus Association, December 7, 2007.

⁵ U.S. General Accounting Office, *Surface Transportation: The Availability of Intercity Bus Service Continues to Decline*, GAO/RECD-92-126 (Washington, D.C., USGAO, June 2002)

EXHIBIT 4

**IS PORTABLE TECHNOLOGY CHANGING
HOW AMERICANS TRAVEL?
A SURVEY OF THE USE OF ELECTRONIC DEVICES
ON INTERCITY BUSES, TRAINS, AND PLANES**



DEPAUL UNIVERSITY

Chaddick Institute for Metropolitan Development

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Joseph P. Schwieterman, Ph.D.*, Lauren A. Fischer**,
Steven Field, Andrew Pizzano, and Susan Urbanczyk
Chaddick Institute for Metropolitan Development
Chicago, Illinois
312/362-5732

jschwiet@depaul.edu

* director of Chaddick Institute and professor in the School of Public Service

** research associate, Chaddick Institute

Executive Summary

This study measures the use of portable electronic technology by travelers on intercity trains, planes, and buses. Using data obtained from field observations of 7,028 passengers in fourteen states, it shows that travelers on “curbside” bus operators, such as Boltbus and Megabus, and high-speed Acela Express trains are the heaviest users of portable technology. At randomly selected points during trips, 39.6% of passengers on curbside buses are using some form of portable technology— two percentage points more than on conventional Amtrak trains and more than twice that on commercial flights and Greyhound. Technology use on the high-speed Acela Express is higher than curbside buses on weekdays but lower on weekends.

The type of technology used by travelers differs widely between modes of travel and day of week. More than half of technology users on curbside bus services are engaged in *audio activities*, such as cell-phone calls, using digital music players, and other such activities. Usage on trains is much different, with users of *visually oriented technologies*, such as those involving laptop computers and other devices with LCD screens, outnumbering audio users by more than two-to-one.

These and other findings suggests that the ability to use portable electronics is an important factor offsetting the longer travel time associated with certain bus and train trips and providing a new incentive for travelers to use transportation services that operate to and from the downtown districts of major cities. To support this premise, the final section of the study shows that that intercity bus service expanded 5.1% in 2009—a rate of growth higher than all other major modes for the third straight year.

I. Introduction

Travelers on long-distance bus, train and airplane trips used to occupy their time in transit by performing relatively simple tasks, such as conversing with fellow passengers, reading, writing, or napping. Many relished their separation from the daily bustle of life by being caught in the “travel bubble” of a separate reality. Others, particularly business travelers, chafed at being “out of the loop” while “traveling incommunicado” en route to a destination.

Some travelers still adhere to the old ways, but the characteristics of long-distance travel have changed dramatically during the past two decades. Increasing numbers of travelers use cell phones, laptop computers, iPods, and other mobile electronic devices in order to use their time more effectively on the road. For many, the information age has evolved such that traveling incommunicado has changed to staying constantly in the loop, or “on all the time.”

Transportation companies have encouraged this through the installation of power outlets and signal boosters, thereby providing greater cell-phone coverage on the tarmacs and in the terminals. Every major airline now offers wireless Internet service (Wi-Fi) or plans to offer it soon; and there is a great movement toward allowing in-flight cell-phone calls as well. In early 2009, several major U.S. transportation companies—Airtran Airways and Megabus—for the first time offered free wireless through their entire systems.

Despite this, there has been remarkably little research about the role of portable electronic devices in intercity travel. As a result, some important research questions are unanswered. Which modes of travel are amenable to the use of portable electronic devices? How has the use of portable electronic devices changed people’s perceptions of the importance of speed in their chosen method of travel? How do people change their use of technology over the course of a trip? What does all this mean in terms of how people travel now and how they will travel in the coming years?

II. Goals of Study

This study attempts to fill in part of that research gap by reviewing newly collected data about technology use among travelers in the United States. One portion of the data comes from observing over 7,028 passengers traveling by bus, air, and train. The second portion of the data is part of an ongoing review of the evolution of intercity bus operations from 1960 to today.

Based on the collected data, this study makes two important conclusions.

- The use of portable devices is highest among travelers on “curbside” intercity buses and high-speed trains. On these modes, technology use is more than twice that on commercial flights and Greyhound.
- The advantages intercity bus and rail travel have with respect to the use of portable electronics is a contributing factor to their recent growth in popularity. This is particularly true for “curbside” bus operators like Boltbus and Megabus as well as high-speed and conventional Amtrak trains.

In support of this latter point, newly collected data show that, for the third year in a row, intercity bus service has grown much faster than other modes of transportation, and that nearly all the growth is by curbside operators offering free Wi-Fi and in many instances providing customers access to power outlets as well.

III. Consumer Technology and the American Travel Experience

For consumers, communication systems and passenger transportation services traditionally have been mutually exclusive rather than complementary operations. People wanting to interact with someone (or a group of people) in a distant location could either travel for a face-to-face interaction or use some form of electronic or non-electronic communication (such as courier service, UPS, and U.S. Postal Service) to eliminate the need for a trip. There was often little opportunity to communicate *while* you were traveling, let alone sending documents, photographs, and instant messages during a trip.

For business travelers, the cost of traveling was not just the fare; it was also the loss of productivity. An unwelcome implication of this lost productivity was the need to make an abrupt transition upon arrival. Business travelers dashed to pay phones to catch up on happenings at the office. Documents were faxed to hotels or shipped overnight to distant offices. Pleasure travelers nervously scanned waiting areas, hoping to see a familiar face, typically a family member or friend expected to meet them. Travelers on extended bus or train trips visited the station newsstand to see what had transpired while they were out of touch.

The idea of leisurely, incommunicado long-distance travel persisted in many travel markets well into the 1980s, despite advances in technology that quickened the pace of other aspects of everyday life. With few exceptions, transportation companies did little to imitate the efforts of hotels, which equipped their facilities with full-service business centers that allowed travelers to move seamlessly between work environments. Although the first commercial cellular phone service was introduced in January 1969 on the Penn Central *Metroliner* trains between New York and Washington, similar innovations did not immediately follow. Almost another generation would grow up before the widespread installation of pay phones (particularly the Airphone) on commercial flights in 1984.

Business travelers found these innovations to be modest compared to the services available at offices, hotels, and business centers, which by the late 1980s and early 1990s offered teleconferencing, faxing, and Internet services as well as computer rentals. For common transportation carriers, providing such services was considered

impractical. On-board telephone service was costly to provide. Airlines faced pressure to increase the number of passenger seats on flights, which resulted in great densities that reduced legroom and made coach cabins even less conducive to business activity. Amtrak and Greyhound, meanwhile, struggled merely to provide a safe and reliable product, making more sophisticated business-oriented amenities only a far-off dream.

By the late 1990s, however, technological innovation had advanced to the point that travelers had many more options at their disposal. Portable devices became smaller, less expensive, and more sophisticated. Starting with laptop computers and cell phones and followed in the early 2000s by Blackberries, iPhones, notebook computers, compact memory devices, and a wide array of portable entertainment systems, consumers began performing increasingly complex tasks on the road. Rather than providing the communication and entertainment themselves, carriers turned to supporting the use of devices carried by passengers and put less emphasis on centralized entertainment systems.

Previous research on the effects that technology is having on travel behavior is briefly described in Appendix A. Some of the more notable recent works are listed in the Reference Section at the back of this report.

IV. Accommodating Passengers with Portable Electronic Devices

To appreciate the transformative effects of portable electronic devices on travel over the past 25 years, consider some innovations made by air, motor coach, and rail carriers.

- Amtrak. Passenger trains have natural advantages over airlines with respect to technology use. Electronic equipment can be used continuously throughout trips, and the spacious configuration of train coaches is relatively conducive to the use of laptop computers and DVD players. Power outlets are now widely available on heavily traveled corridors. There are no constraints on the use of cell phones, although coverage is inconsistent on some routes, with “dead spots” occurring, particularly on routes outside of the Northeast corridors.

Despite the fact that commuter railroads in the metropolitan Boston and San Francisco areas installed wireless Internet service in 2007, making them the first U.S. rail-passenger carriers to offer this feature, Amtrak has been slow to match their achievement. Although Amtrak succeeded in installing electric outlets on its trains in many corridors, it ran into difficulties with wireless Internet due to the prevalence of tunnels and the length and capacity of its trains, both of which make installation difficult.

This year, however, Amtrak has made notable progress. The carrier has introduced free wireless service on Acela Express routes and hired a private contractor to begin installing Wi-Fi on its Capitol Corridor in California. Amtrak also rents portable DVD players and sells batteries on board its trains. For the foreseeable future, however, wireless will be available only on a small portion of its routes.

- Intercity Bus Companies. For decades, the onboard product delivered to intercity bus travelers was largely unchanged. Passengers could expect little except a cushioned seat in an air conditioned environment with a reading lamp overhead. Over the past three years, however, bus companies—particularly “curbside” operators that do

not operate from conventional bus stations and typically sell tickets only over the Internet—have pushed themselves to the forefront of the wireless Internet movement.

In the summer of 2007, DC2NY Bus, a curbside operator, launched service between Washington, D.C., and New York, becoming the first U.S. carrier on a major intercity route to offer free Wi-Fi. The carrier also pioneered the availability of power outlets on buses. These features became more prevalent when Boltbus, a joint venture of Greyhound and Peter Pan Bus Lines, launched services between New York, Boston, Philadelphia, and Washington, D.C., in April 2008.

Megabus quickly followed, offering wireless Internet service on all its routes, first in the Northeast and then in the Midwest. Wi-Fi gradually became the accepted standard for curbside operators, so much so that passengers felt slighted when it was not available. Various “Chinatown” carriers (bus operators linking the Chinatown districts of major cities, typically operated by Chinese-owned businesses), attempted to forestall their loss in market share by spending an estimated \$5,000 per vehicle to equip their buses with Wi-Fi. Greyhound is on the tail end of the trend. In late 2009, it introduced buses with wireless service and power outlets serving the major Northeastern corridors as well as the New York–Montreal route. Now, it anticipates having its entire system equipped with wireless within the next several years.

- Commercial Airlines. Passengers traveling by air understand that aircraft are not particularly amenable to the use of some electronic devices. Devices must be deactivated after leaving the gate and remain off for an extended period, leaving travelers on short flights with only a short time to use them. The design features of commercial airplanes make power outlets and centralized computer-equipped work stations impractical to install. Moreover, airlines discourage passengers from moving about, forcing self-service technology, such as pay telephones to either be made available at each seat or not at all.

Airlines make special allowances for passengers to travel with laptop and notebook computers. However, when flights are full, keeping such equipment at your seat can be awkward. Even the seemingly simple act of retrieving a laptop from an overhead compartment can be difficult, as many are filled to capacity. Due to gradual reductions in seat pitch, escalating load factors, and the “hassle factor” of airport security in the post-9/11 environment (requiring travelers to complete a series of tasks before boarding the plane and taking their seat), many travelers opt to bring only the smallest devices, such as cell phones and iPods, with them. Others aggressively use their frequent flyer status to upgrade to business or first class cabins where seating is more spacious.

Another problem, of course, is the lack of wireless Internet and cell-phone connectivity. Although the push to provide wireless Internet on commercial flights gathered momentum in 2004, it was not until 2008 that Wi-Fi became available on an appreciable share of domestic flights—generally at a considerable price. Since then, most airports have also installed wireless Internet systems and invested in making their gate areas and tarmacs “hot spots” for cell-phone users. Airtran now offers free wireless, and by early 2010, Delta expects to have Wi-Fi available for a fee on its domestic flights. Google attracted considerable attention by sponsoring free wireless in 47 airports in late 2009. Just how quickly airlines find a way to allow in-flight cell phone service remains to be seen.

TABLE 1:
CORRIDORS AND ROUTES SURVEYED

Amtrak (6,001 observations on 21 departures)

Northeast Corridor (New York – Washington, New York – Boston)
Keystone Corridor (Harrisburg – Philadelphia)
East Coast Service (Washington, D.C. – Jacksonville)
Wolverine Corridor (Chicago – Detroit)
Hiawatha Corridor (Chicago – Milwaukee)
Lincoln Service (Chicago – St. Louis)
Illini Corridor (Chicago – Carbondale)

Megabus/Boltbus routes (1,381 observations on 19 departures)

Baltimore – New York route
Boston – New York route
Chicago – Milwaukee/Twin Cities route
Chicago – Indianapolis route
Cincinnati - Indianapolis route
New York – Philadelphia route
New York – Washington route

Greyhound routes (355 observations on 10 departures)

Baltimore – New York route
Chicago – Champaign, Ill. route
Chicago – Milwaukee route
Chicago – Madison route
Chicago – Indianapolis route
Chicago - Quad Cities route
Philadelphia – Baltimore route

Commercial Flights (652 observations on 10 departures)

Atlanta - Chicago (Air Tran)
Indianapolis – Chicago (American)
Indianapolis – New York (Continental)
Chicago – New York (Southwest)
Chicago – Newark (Continental)
Chicago – Washington (United)
New York – Atlanta (Air Tran)
New York – Chicago (Southwest)
Washington – Chicago (United)
Washington – New York (United)

Commuter Railroads (1,716 observations on 16 departures)

Various routes on Metra and South Shore Line in metropolitan Chicago and Caltrain in metropolitan San Francisco. Data from Caltrain were not ready for inclusion in this analysis and will instead be evaluated in future publications.

V. Measuring the Use of Portable Electronic Devices

To understand the patterns of consumer use of portable electronic devices, field observations were made on common carriers between October and December 2009, primarily on intercity buses and Amtrak trains but also encompassing airline flights and commuter trains (see Table 1 on previous page).

Field researchers conducted visual surveys to measure the use of two basic features of electronic devices: (1) those using *audio features* of devices, such as cell phones, CD players, or other devices that can be used with earphones or headsets, and (2) those using *visual or audiovisual features*, such as the LCD screens of laptop computers, Blackberries and other smart phones, DVD players, and iPods (essentially, any travelers looking at a screen for the purpose of engaging in an activity more substantial than placing a phone call or changing a music selection fell into this category). These activities typically involve the observance of images or information on LCD screens (Table 2).

TABLE 2

CLASSIFICATION OF ACTIVITIES INVOLVING PORTABLE DEVICES

Notable Examples

Visual and Audio-Visual Activities

- Laptop and notebook computers with active LCD screens
- DVD players, and portable television sets
- Screen-based functions of
 - iPods and iPhones
 - Blackberries
 - Smart phones and similar devices.
- Electronic calculators
- GPS devices

Audio Activities

- Cell phones, Blue-Tooth headsets, and related communication device
- Voice recording devices
- Pocket radios and scanners
- Audio/telephone features of
 - iPods and iPhones
 - Blackberries
 - Smart phones and similar devices.

Our survey involved observations of 7,028 unique passengers on 82 different transportation departures to and from major cities (Table 3). The sample was limited to daytime services in corridors with multiple trains and buses per day rather than on long-

TABLE 3:
SAMPLE SIZE BY MODE OF TRANSPORT

<u>Mode</u>	<u>Carriers</u>	<u>Departures Surveyed</u>	<u>Unique Passengers Observed</u>	<u>Total Observations</u>
Train—Conventional	Amtrak	21	3,179	5,133
Train—High speed	Acela Express	6	868	868
Commuter train	Metra, South Shore Line	16	1,381	1,381
Bus—Curbside	Megabus, Boltbus	19	697	1,716
Bus—Conventional	Greyhound	10	251	355
Commercial flight	AirTran, Southwest United, Continental, American	10	652	652
Total		82	7,028	10,105

distance runs with a single daily departure. On longer trips, passengers were surveyed multiple times, bringing the total number of passenger observations to 10,105. The data were collected in 14 states as well as the District of Columbia. We provide in the Appendix B a list of states in which data was collected.

VI. Principal Findings

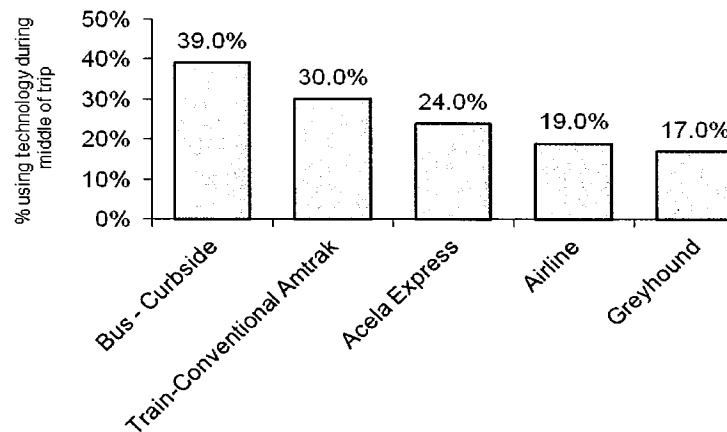
Our review allowed us to make six principal conclusions that show how technology use differs across travel modes and circumstances.

Finding 1: On weekends and weekdays after 7 p.m., technology use is higher on curbside buses than on any other mode. Nearly 40 percent of passengers are engaged with portable devices at any given point. Cumulatively, with all time periods combined, curbside bus use trails only the business-oriented Acela Express in technology usage.

Our observations involving curbside bus and Amtrak passengers during weekends/weekdays after 7 p.m. are limited primarily to the Midwest. We hope to build a more comprehensive national sample involving off-peak trips from other regions in the months ahead. In our sample, however, the differences between modes appear to be dramatic (Figure 1).

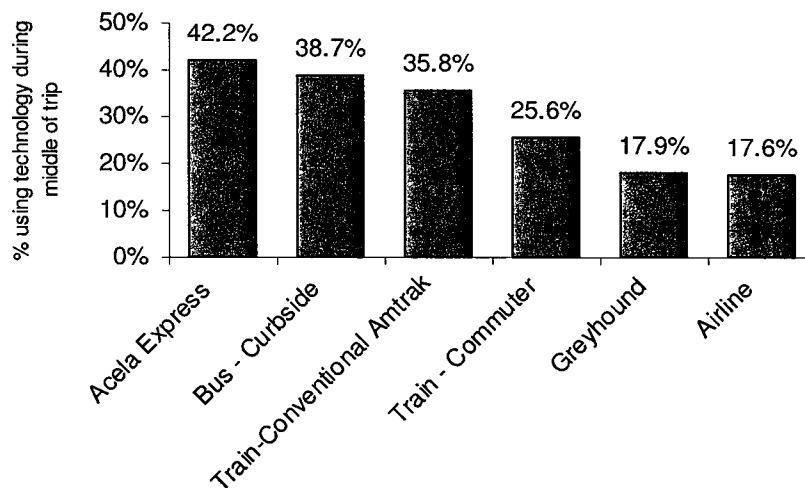
The use of technology on curbside buses during weekends/late evenings exceeds that of all other modes by an appreciable margin. Usage rates (39%) are far ahead of conventional Amtrak train's 30 percent, Acela Express' 23.5 percent, and airline's 19.5 percent. Moreover, unlike on trains, technology use on curbside buses is almost the same on weekdays before 7 p.m. and at other times.

Figure 1:
Technology Use by Mode of Travel
Weekends and Weekdays after 7 p.m.



When both weekday and weekend data is combined, the *cumulative* average rate of technology use on the Acela Express is highest at 42.2%, followed by curbside bus (38.7%) and conventional Amtrak trains (35.7%). On average, each of these modes see technology usage at more than twice the rate of commercial flights and Greyhound.

Figure 2:
Technology Use by Mode of Travel
Cumulative



We discuss the extensive usage on the Acela Express below in Finding 2. On curbside buses, the intensity of technology use appears to be partially attributable to the young and upwardly mobile demographic of customers served. These passengers appear quite savvy about technology, making Wi-Fi an important amenity. (Nearly all passengers purchase tickets online and a significant share of them display their electronic receipt on a smart phone to board the bus.) Unlike trains, which typically have lengthy “dead spots” in terminal areas and rural environments curbside-bus operations typically benefit from virtually uninterrupted cell-phone signals. In fact, cell phone towers are often along Interstate highways that these buses use.

The informal nature of the boarding process may also be significant. Whereas passengers on planes and trains typically turn off portable devices before boarding, perhaps due to boarding procedures which include the presentation of identification and finding assigned seats in crowded environments, curbside bus passengers need only allow a few seconds to find a seat. Some simply display their ticketless confirmation on an LCD screen when boarding and then continue to use the device for other purposes.

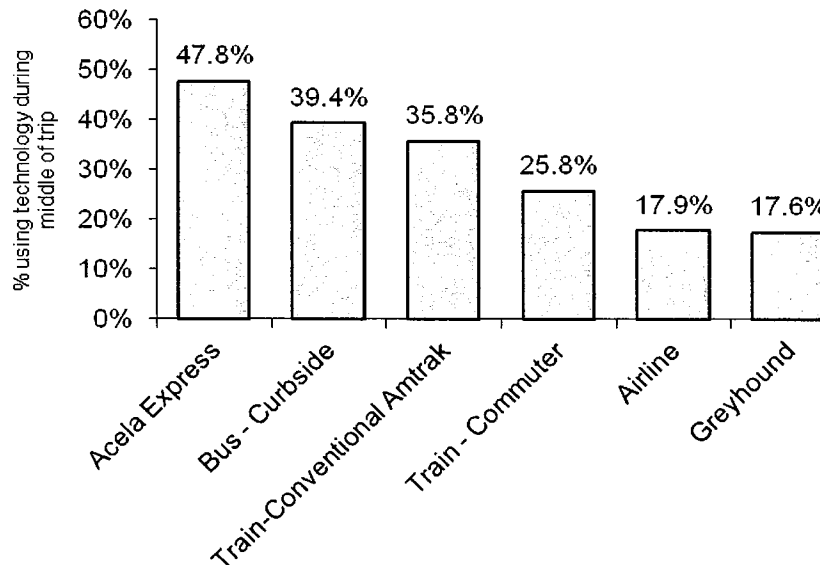
Another factor may be that there are fewer intermediate stops on curbside bus operations than on many Amtrak and Greyhound trips, thus minimizing disruptions and allowing passengers to more easily use technology as a means of insulating themselves from the surrounding environment. Although the seating density is high, load factors are often low, allowing passengers to spread out. Similarly, the lack of cabin pressurization creates a more relaxed travel environment than on airlines, making passengers feel much more comfortable using relatively complex devices.

Finding 2: The rates of use of portable technology on Amtrak’s Acela Express greatly surpasses usage on all other modes during weekdays before 7 p.m., when an estimated 48 percent of passengers are using portable technology at any given point. Approximately 85 percent of these technology users are engaged in activities involving visually oriented devices.

The differences between Acela Express service and other modes of intercity travel are striking. On weekdays prior to 7 p.m., 47.8 percent of passengers are using some form of technology, more than eight percentage points higher than conventional Amtrak runs (39.4 percent) and curbside bus operations (38.5 percent). It was not uncommon for Acela passengers to be engaged in multiple technology activities; many were talking on the phone or listening to music while working on laptop computers, apparently linked to the Internet. A summary of these differences appears in Figure 3.

None of the weekday Acela trips had fewer than four in ten passengers using technology at any time we conducted the survey. The lowest had a 41 percent usage rate, which was nearly double the highest technology usage observed on an airline trip (22 percent).

Figure 3:
Technology Use by Mode of Travel
Weekdays before 7 p.m.



The gap between Acela trains and commercial flights may be even greater than these numbers suggest. Acela service competes predominantly with short-distance flights by airlines, on which technology use is obviously limited by the need to keep devices deactivated during a higher proportion of the trip than on long-distance flights.

An overwhelming share of Acela Express passengers use devices for their visual capability (mostly laptop and notebook computers), an observation we discuss further in Finding 4 on the next page. On weekends, however, overall technology usage on Acela trains is far less intensive. In our sample of 240 passengers, only about 24 percent were using technology at various points. There appears to be a far greater tendency for passengers to travel in groups on the weekend, making reading and conversation more dominant uses of time.

Finding 3: Greyhound has only about half the technology use as curbside bus operators. This is apparently due to both the demographic segment it attracts and the types of routes it services. The lack of Wi-Fi service on the majority of Greyhound's routes appears to be only a secondary factor in explaining the low rates of technology use.

Technology use on conventional Greyhound trips averages just 17.6 percent. A mere 8 percent of passengers use devices strictly for their audio capacity (which generally don't require access to the Internet), the lowest of any mode observed in our sample except airlines. The fact that audio devices are so sparsely used suggests that there is an additional factor, other than the absence of Wi-Fi that limits technology use on Greyhound.

One such factor may be the clientele that Greyhound serves, which appears less affluent and less apt to use technology. Moreover, an appreciable share of travelers are in the midst of long journeys, even transcontinental trips. Driver announcements may also play a role. On two trips, for example, the bus drivers asked passengers after dark to be as quiet as possible and to put cell phones on "silent mode;" one driver even threatened to stop the bus if this rule was violated.

The uneven quality of Greyhound stations—some are located in high-crime areas—and the onboard atmosphere may also be factors. Similarly, there is a greater propensity for Greyhound buses to make intermediate stops than curbside bus operators, causing more potential disruptions to thru passengers as others exit and enter throughout the duration of their trip.

In the future, we plan to expand our data beyond the current sample of ten Greyhound departures. The consistency of technology use across our sample, however, suggests that there is high product differentiation in the intercity bus sector, between traditional and newer curbside operators.

Finding 4: Technology users on curbside bus carriers divide their time almost equally between using audio features and visual features. On Amtrak trains, however, the use of visual features outnumbers the use of audio devices by a two-to-one margin.

On both curbside bus operators and Greyhound, passengers divide their time almost equally between audio and visual technologies. On curbside bus operations, for example, the use of audio and visual devices is split 20 percent and 19 percent, respectively. Conversely, on conventional Amtrak trains, visual technology use exceeds audio use by a margin of two to one. On Acela Express, the ratio is six to one, as the dominant technologies are laptops and notebook computers. Some of the differences are summarized in Table 4.

TABLE 4:
USE OF TECHNOLOGY BY MODE OF TRANSPORTATION

	Percentage of Passengers Using Technology (Middle of Trip)		Approx. Ratio Visual to Audio
	<u>Visual</u>	<u>Audio</u>	
Train—High speed	36%	6%	6:1
Bus—Curbside	19%	20%	1:1
Train—Conventional Amtrak	24%	12%	2:1
Commuter Train	17%	8%	2:1
Commercial Flight	8%	9%	1:1
Bus—Greyhound	10%	8%	5:4

Sample size: 7,028

Demographics and environmental factors are also relevant. In comparison to other modes of travel, only a small proportion of curbside bus travelers are traveling for purely business purposes. These passengers appear more apt to use music players and cell phones than DVD players and laptop computers. Concerns over privacy may also contribute to the relative dearth of visual-technology use not only on buses, but on commuter trains and flights as well. Whatever the reasons, bus travelers seem to use visual technologies for shorter durations than their rail counterparts.

The emphasis on visual technology use on Amtrak is also noteworthy. Amtrak's generous seat pitch and fold-down tray tables make it more conducive to laptop computer use. Visual technology is most common on weekday trains, when 28 percent of passengers are using it at any given point, well above that of curbside buses (20 percent), commuter trains (17 percent) and airlines (6 percent).

Finding 5. On the average commercial flight, only 17.6 percent of passengers are using technology at any given point. The low usage does not appear to be a lack of interest in technology, but some other factor, such as the in-flight environment, the lack of wireless connectivity, or the short duration of many trips. In fact, the use of technology, particularly laptop computers, is much higher in terminal waiting areas than while in flight.

The density of seating as well as restrictions on the use of electronics at takeoff and landing create strong incentives for passengers to either avoid using technology or to limit use to devices that can be easily kept in their pocket. The start and end of trips appear to be critical times for the use of devices, particularly communication systems, thus putting airlines at a notable disadvantage. Once devices are turned off, many customers do not turn them back on until they disembark.

Our sample is not large enough to allow for definitive conclusions about how the time-of-day and availability of airline in-flight entertainment systems affects portable technology use on commercial flights. Preliminary analysis, however, suggests that weekend usage appears almost the same (at about 19 percent) as weekday usage. In terminal waiting areas, conversely, we estimate that technology use exceeds 30 percent.

The survey also provides evidence to suggest that the use of portable technology may not be appreciably different between flights with in-flight entertainment systems and those without it, averaging between 17 and 18 percent in both cases. It does *not* appear that many people are leaving portable technology devices off due to the availability of centralized entertainment systems.

Finding 6. The types of portable technology devices that bus and train travelers use are remarkably consistent during different phases of their trip. There is a slight tendency for curbside-bus travelers to shift away from using devices for their audio capacity in favor of visually oriented activities further into the trip.

Among all types of passengers, there is great consistency in the use of technology over the course of a trip. In the period between about 20 minutes into the trip and one hour into a trip, however, the share of curbside bus passengers using audio

technology drops from 21.2 percent to 19.7 percent while the share of visual-technology users increases from 17.8 percent to 18.9 percent. Although this change is slight, it suggests that more passengers use audio devices before transitioning to more intensive visual technology than the other way around.

VII. Implications and Conclusions

The above findings suggest that the growing prevalence and sophistication of portable electronic technology is diminishing the perceived cost of time spent on buses and trains for many travelers. As a greater share of communication is handled through text messages and emails as well as through social-interaction sites such as Facebook, it appears that many consumers place a premium on the ability to use portable devices when traveling. The rapid expansion of 3-G and 4-G wireless networks makes travel on buses and trains more attractive.

There is no regularly published data on the number of passengers using intercity buses. The Chaddick Institute, however, conducts an annual analysis of the *amount of service* provided by intercity bus lines. Using the same methods as in previous years, we estimate that the amount of growth between the 4th quarter of 2008 and the same period in 2009 to be 5.1%.

The rates of growth of various modes of transport are compared in Table 5. Amtrak service has remained relatively constant (falling by about 1%) while air service fell by 3.2%. For the third consecutive year, consequently, intercity bus service outpaced other modes of transport. Nearly all of the growth in the intercity bus industry is accounted for by curbside carriers offering express service with free wireless internet between major cities. The amount of service by Greyhound and other conventional bus operators remained virtually unchanged from the previous year.

TABLE 5
GROWTH RATES BY TRANSPORTATION MODE
AMOUNT OF SERVICE PROVIDED

Most recent data, 2008 vs. 2009

<u>Mode</u>	<u>Measure</u>	<u>Change</u>	<u>Source of Data</u>
Intercity Bus	departures	+5.1	Chaddick Institute
Commercial Airlines	departures	-6.8%	Bureau of Transportation Statistics
Amtrak	train-miles	-1%	Amtrak.com

Auto travel appears to be relatively flat. AAA estimates that it was sharply down 11% during Labor Day but was up 2.1% over Thanksgiving holiday.

Note: Amtrak data is for January through August 2008 relative to same period in 2009, the most recent month available. Air Transport Association data is for January - September 2009, the most recent month available. Air service has risen marginally since then, but remains lower than the same period last year.

Although the ability to use portable technology may be only a secondary factor in explaining the growth of bus travel—low fares are likely the principle reasons for the sector's growth—the evidence suggests that it is important to explaining the industry's continued growth in the midst of difficult economic circumstances. More than 90% of the growth in bus service is attributable to curbside bus operators with free Wi-Fi. Much of this growth was in the Northeast Corridor. Baltimore and Philadelphia service grew in particularly dramatic fashion over the past year.

Data collected in the coming months will allow for additional perspective on the role of portable electronic devices in intercity travel behavior. These updates will be posted on www.depaul.edu/~chaddick

VIII. Appendix

A. Notes on Previous Research

Previous research offers a useful framework for understanding the differing rates of technological adoption by populations but is limited in scope on matters related to the behavior of intercity travelers. Considerable research has been published, for example, exploring varying access to cellular phones and the Internet. As is evident in the reference section, much of the research can be classified into one of two subject areas: that focusing on the persistent “digital divide” and its implications for e-government, retail spending behavior, and career opportunities (Jackston, et. al., 2008), and that focusing on travel in an international setting, particularly Europe. Several studies (Sasaki and Nishii, 2009; Kim, Park, and Morrison, 2009) break new ground on how technology is affecting travel decisions. None of these studies, however, directly compare the use of portable devices by passengers while traveling on intercity routes, which is the primary focus of this study.

B. Notes on States involved in Sampling Process

The data collection for rail and bus passengers was conducted in 14 states as well as the District of Columbia. Rail passengers were observed on trains in California, Connecticut, Delaware, Illinois, Indiana, Massachusetts, New Jersey, New York, Pennsylvania, Rhode Island, Virginia, and Wisconsin. Bus passenger data was collected in each of those states, except for California, and also in Ohio. Station stops were made in each of these states except for the bus route through Rhode Island, which the bus passed through without making a stop. Flight data were collected between airports serving Atlanta, Chicago, Indianapolis, New York, and Washington, D.C. All flights were two hours and 45 minutes or less in duration.

The Chaddick Institute wishes to thank Alice Bieszczat, Amy Creyer, Erin Menke, Suzanne Ostrovsky, and Sara Smith for assistance to the research team.

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EXHIBIT 5

The Washington Post

Some Low-Fare 'Chinatown' Buses Told to Halt Over Safety

By Bill Brubaker
Washington Post Staff Writer
Wednesday, November 23, 2005

Federal officials have stepped up surprise inspections of low-fare bus companies in the Washington-to-Boston corridor amid concerns by federal and state regulators that some curbside operators are unsafe and under-regulated.

A late October inspection sweep of 400 buses by a task force of federal, state and local authorities turned up more than 500 safety-related violations, according to the Federal Motor Carrier Safety Administration, which regulates interstate bus and truck companies. The violations included speeding, a broken horn, and inadequate brakes and windshield wipers.

Following the inspections, the FMCSA ordered 56 buses and 13 drivers out of service, agency Administrator Annette M. Sandberg said yesterday.

Most of the buses inspected were operated by budget carriers that have become increasingly popular, picking up passengers at designated curbsides and offering round-trip fares as low as \$35 between Washington and New York -- below that charged by major carriers such as Greyhound. The budget carriers are commonly known as Chinatown buses because they once primarily served Asian communities in the Northeast.

With the holiday travel rush underway, the agency has targeted specific companies for detailed reviews in early December, Sandberg said.

"My concerns are with operators who operate on the margins," she said. "Whenever somebody is operating on a very low margin . . . the first thing they cut is safety . . . whether it's safety management or maintaining the equipment or making sure they are doing drug or alcohol testing on their drivers . . . or carrying the proper levels of insurance."

Separately, the Justice Department says it has launched two investigations into whether discount carriers are complying with provisions of the Americans with Disabilities Act, department spokesman Eric Holland said. Sandberg said she has relayed to the department reports of budget operators that do not have wheelchair lifts on their buses.

The new government scrutiny follows two fires involving low-cost carriers on the New York-Boston route this year and concerns raised by Sen. Charles E. Schumer (D-N.Y.) that some discount carriers are being allowed to operate with "egregiously low" federal safety ratings.

A review by The Washington Post found that three companies offering service from the District to New York this year received low FMCSA safety ratings, including one, Tomorrow Travel & Tour Inc., that

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was ordered out of service last summer but kept operating.

"I am very concerned that because of lax safety precautions and insufficient oversight more incidents could happen, putting hundreds of thousands of riders in danger," Schumer wrote Sandberg on Aug. 28.

Sandberg agreed more needs to be done.

"I can tell you, being a former law enforcement officer: You try to get to crime or safety before the problem exists," said Sandberg, former chief of the Washington State Patrol. "But oftentimes, you are reacting at the back end."

Overall, bus travel is relatively safe, with about half the fatality rate of automobile travel. But concerns about the industry have peaked recently, with the spreading popularity of budget carriers and a handful of high-profile incidents. Most recently, a bus fire in Texas killed 23 hurricane evacuees leaving a nursing home.

The FMCSA formed a task force in 2003 to investigate low-fare carriers in the Northeast. In a speech to the American Bus Association last year, Sandberg reported: "Our investigations revealed a complex web of business relationships among these low-fare operators. Dozens of motor carriers are interwoven and share their business in a way that makes it challenging to determine who is responsible for their operations."

Gladys Cole, an FMCSA spokeswoman, said one enforcement problem is that bus carriers ordered out of service can start up again after forming a new company and paying a \$300 registration fee.

"You can go online and apply for authority [to operate], pay your \$300, and you're back in business," she said. "And when the heat gets on you, you go out of business -- or the agency puts you out of business -- you pay \$300 and you start up again."

Among companies that serve the Washington region, Tomorrow Travel & Tour, which operated a bus line called Dragon Coach, was ordered to suspend service on Aug. 8 after it failed to pay a \$4,400 fine. The fine was assessed because the company did not register with the FMCSA and did not have a required drug- and alcohol-testing program for its drivers, according to Robert W. Miller, a special assistant at the agency. The FMCSA has tacked on an \$8,800 fine -- also overdue -- because the company continued to operate after being ordered to shut down, Miller said.

A company called Dragon Expressway & Travel Inc. is now selling bus tickets under the Dragon Coach name and is using the same address and phone number Tomorrow Travel & Tour used.

A woman who answered the phone at the bus company office said one bus was scheduled to go from Washington to New York yesterday, leaving from 14th and L streets NW, with seven scheduled for today. The woman declined to give her name and referred questions about the company's ownership to a manager. The manager did not return a call.

Schumer's letter to Sandberg in August was written 12 days after a bus operated by Boston-based Fung Wah Bus Transportation Inc. burst into flames on a Connecticut highway. The 45 passengers escaped before the fire started. In March, a coach run by a bus line called Travel Pack caught fire. Those passengers also escaped unharmed.

On the Washington-New York route alone, about 10 low-cost carriers have emerged in recent years to

challenge the traditional carriers, Greyhound and Peter Pan. The budget buses typically charge \$35 round-trip on that route -- together offering more than 50 departures on peak travel days, such as today. Greyhound and Peter Pan have dropped their fares. Greyhound trumpets a \$20 one-way fare for tickets bought on its Web site.

The discount companies vigorously compete for business on Web sites that provide e-ticketing and a plethora of reasons why their service should be chosen. "Customers' satisfaction is our No. 1 priority," says Philadelphia-based New Century Travel.

Some budget travelers like the buses just fine.

"They're really clean, they show movies, they have bathrooms," said Margot Zengotita, in town doing research at the Library of Congress, as she waited for the day's Dragon Coach bus to New York.

Special contributor Mark Chediak, staff writers Ellen McCarthy and Lena Sun, and researcher Richard Drezen contributed to this report.

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EXHIBIT 6



2008 Update on Intercity Bus Service:
Summary of Annual Change

Chaddick Institute Policy Study

November 24, 2008

Joseph Schwieterman, Ph.D., Professor
Lauren Fischer, Research Associate
Sara Smith, Research Assistant

Chaddick Institute for Metropolitan Development*
DePaul University
243 S. Wabash, Chicago, IL 60604

<http://las.depaul.edu/chaddick>
email: lfische6@depaul.edu

Overview

This report is an update of *The Return of the Intercity Bus: The Decline and Rise of Scheduled Service to American Cities, 1960 – 2007*, a study issued by the Chaddick Institute for Metropolitan Development in late 2007. The earlier study describes the general recovery of the intercity bus sector since early 2006 after more than four decades of decline.

Since last year's report was released, the Institute has gradually expanded its stratified sample of historical bus arrivals and departures in major cities across the United States, creating a data set of 10,150 bus operations. As noted in the earlier study, the data includes all arrivals and departures of all conventional intercity bus companies, such as Greyhound Lines and Continental Trailways, as well as operators that rely on "curbside" pickup instead of traditional stations. (The data set does not include service by so-called "Chinatown" bus lines or commuter-bus operators).

A summary of the notable changes in service from the fourth quarter of 2007 to the fourth quarter of 2008 follows.

General Changes in Service, 2007-08

- Scheduled bus service grew 9.8% between the fourth quarters of 2007 and 2008. This marks two consecutive years of robust growth after more than four decades of persistent decline. The annualized rate of growth between the second quarter of 2006 and the fourth quarter 2007 was 8.1%. (See Table 1 for historical comparisons)
- The increase in the amount of service provided by the intercity bus sector has significantly outpaced other modes of intercity transportation. Intercity rail service, measured in train-miles, grew by 3.3% over the first eight months of 2008.¹ Over the same period, there were large declines in both domestic air service (down approximately 8% for the fourth quarter) and automobile travel (down approximately 3.3%²).
- The renaissance of intercity bus service dates to May 1, 2006, when Megabus (a unit of Stagecoach, Ltd.) introduced service to several Midwestern cities from Chicago. This regional system handled more than 180,000 passengers in the 3rd quarter, 2008.
- Most of the growth over the past year has been attributable to the introduction of new service with curbside pick-up in the northeastern states. Boltbus (a joint venture of Greyhound and Peter Pan Bus Lines) and Megabus each launched high-frequency service in spring 2007 between New York and Washington, D.C., as well as in other regional markets. Outside the Northeast, traffic on the intercity bus system has remained relatively stable.

Environmental and Economic Considerations

- The *growth* of new bus operators with curbside pick-up over the past year has reduced the carbon dioxide emissions by an estimated 36,000 tons. These estimates are based on the proportional shift in travel from less fuel-efficient modes to more fuel-efficient modes of transportation.³ More detailed calculations are available at <http://las.depaul.edu/chaddick>
- The increased demand for bus service is due in part to the escalation of fuel prices, which significantly raised the cost of air and automobile travel throughout much of 2008. Demand was also influenced by the revival of the downtown districts in major cities, higher parking costs, and the growing acceptance of bus travel among younger travelers and pleasure-oriented travelers. The combination of these factors has allowed the newest operators, most notably Boltbus and Megabus, to become self-sustaining (and on some routes profitable) only a few months after launching service in the Northeast.
- At present load factors, the new operators offering curbside pickup achieve about 150 passenger miles per gallon of fuel (based on an average load of 30 people). This is roughly four times the fuel efficiency of air travel and five times the fuel efficiency of the average single-occupant automobile.
- The expansion of the sector has reduced fuel consumption by an estimated 3.48 million gallons (a mix of gasoline, diesel fuel, and jet fuel). Detailed calculations are available at www.las.depaul.edu/chaddick

Regional Considerations

- The expansion of intercity bus service remains strongest in corridors involving major metropolitan areas separated by 175 to 300 miles in the East and Midwest. The California market has seen less growth, partially due to the strength of the state's rail-passenger network and to certain urban-design issues that make downtown-to-downtown service less convenient for many travelers. In general, the greater distances between cities in the Western United States reduces the appeal of intercity bus service which is most attractive for trips under 300 miles.
- Megabus' decision to close its Los Angeles hub in early 2008 resulted in the most significant *reductions* in service over the past year. California Shuttle Bus has partially filled the void in that state and appears poised for expansion.
- New York City has seen the greatest increase in service over the past year due to the simultaneous expansion of Megabus and Boltbus. Megabus and Boltbus now serve eleven and three cities from New York, respectively. Both launched service in the Northeast in the spring of 2007.

- There is no convincing evidence that the amount of service to small towns has appreciably increased over the past year. To the contrary, there appears to have been sporadic reductions in this service on lightly traveled routes. Some of the remaining routes are subsidized by state governments. The dramatic growth of curbside service has apparently contributed to this trend, siphoning passengers away from the more traditional hub-and-spoke network.

Trends

- A notable achievement this year by major “curbside” operators was the widespread introduction of wireless Internet service. Wireless is now available on all Boltbus and DC2NY Bus routes and on many Megabus routes. Nevertheless, certain problems with the technology (such as malfunctioning equipment) still exist and need to be resolved.
- The rising number of double-decker buses operated by Megabus (which is expanding its fleet of 81-seat double-deckers from 16 to 112) suggests that the average number of passengers per bus departure is growing.
- Although pleasure travelers, students, and travelers on personal trips are by far the largest share of the sector’s growth, there are growing indications that corporate travelers are turning to curbside operators in the Northeast. A year ago, there was little evidence that this segment was using intercity bus services to any notable extent. Data about the type of travelers using intercity bus service, however, is limited.

Notes on Traffic Growth

- The changes in *passenger traffic* handled by intercity bus operators is difficult to measure accurately because there are no standard reporting practices by the carriers. Details about this problem appear in our earlier report.
- Megabus traffic grew 97% between October 2007 and October 2008. There is evidence suggesting that traffic handled by Greyhound’s conventional bus services, however, has been relatively flat. When the traffic handled by Boltbus (created by Greyhound and Peter Pan Lines) is included, however, Greyhound has seen appreciable growth as well. Boltbus has not released system traffic numbers, but it has reported that its operation is profitable and has gradually added capacity.
- The DePaul data set was expanded this year with the addition of information on bus routes from major coastal cities, including Philadelphia, Penn., San Francisco, Calif., and Washington, D.C., since 1960. This brings the data set to 10,150 bus operations.

Additional graphics and computational details about the Intercity Bus Project are available at las.depaul.edu/chaddick. Photographs for publication available from Joseph Kearney at jkearne2@depaul.edu.

Summary Statistics

Changes in Bus Service, Annualized

<u>Period</u>	<u>Compound Annual Growth/Decline</u>
1960–1980	-1.6%
1980–2002	-4.3%
2002–2006	-10.2%
2006–2007*	8.1%
2007–2008	9.8%

* annualized rate for period from March 2006 to December 2007.

Reduction in Carbon Emissions due to Growth

33,000 – 42,000 tons (36,000 tons average estimate)

Capacity Changes by Mode, 07 - 08

	<u>Measure</u>	<u>Change (%)</u>	<u>Period</u>	<u>Source</u>
Bus	Departures	+9.8	4 th quarter 07-08	DePaul University
Air	Seat-miles	–8.0	4 th quarter 07-08	Industry data
Rail	Seat-miles	+3.3	Jan–Aug., 07-08	Amtrak.com
Auto	Vehicle miles	–3.3	Jan–Aug., 07-08	FHWA

Footnotes:

¹ Based on Amtrak system performance report, “Summary Metrics,” train-miles Jan–Aug 2008 compared to previous year. Available at www.amtrak.com/pdf/0808monthly.pdf.

² Based on federal estimates, January–August. Available at <http://www.fhwa.dot.gov/ohim/tvtw/08augtv/index.cfm>.

³ Based on estimated 22 pounds of carbon emission per gallon of diesel fuel, 19.4 per gallon of gasoline and 22.4 pounds per gallon of jet fuel. See las.depaul.edu/chaddick for details.

EXHIBIT 7

Buy Tickets

Where We Go

Bolt Rewards



Where do you want to go?

this change, only April 12th & 13th.

Where do you want to go?

departing city	
arriving city	

Travel Date

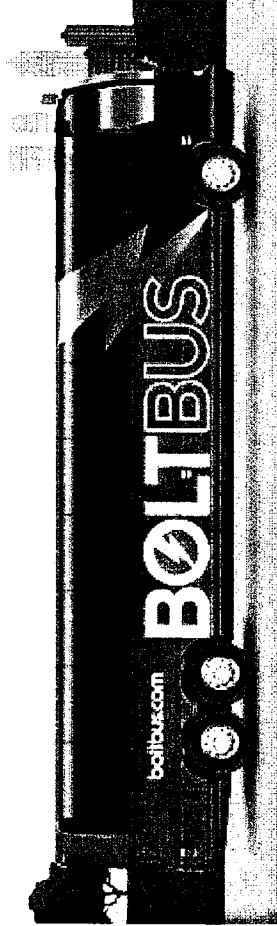
04/13/2010	
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Passengers

1

Special Needs Preferences:
None Edit

Start Booking Now



Sign In

Sign In

My Trip Card

You have no trips in your cart.

Are you a frequent traveler or commuter? Buy all your tickets at once for better pricing and easier checkout.

When you book travel, select "Add To Cart" under the "Purchase Options".

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Join Us to earn rewards for your trips. Joining is free and easy.

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EXHIBIT 8

Hip To Hopping The Bus

Professionals In Their 20s Are Increasingly Taking The Bus As A Way To Save Money



Passengers wait to board a Bolt Bus in New York on July 22, 2008. (AP)

(AP) It's a tale of two cities: Nikita Bernstein, 29, a dyed-in-the-wool New Yorker with a business in Boston, was in need of a cheap way to travel between his two homes. And a place to plug in his laptop, store his bike and stretch his legs along the way.

Bernstein is an example of a growing number of people, often young professionals, that are jumping on the bus as their primary method of travel. The service Bernstein uses most often, discount carrier BoltBus, offers amenities including wireless internet,

electrical outlets, extra leg room and flushable toilets.

Once considered the travel choice of last resort, some say the confluence of rising gas prices, airline headaches and the rise of discount carriers is creating a kind of renaissance in the bus industry.

Joseph P. Schwieterman, a professor of public service management at DePaul University, said growth in the bus industry has accelerated recently - reversing steady declines since 1960 - as low-cost carriers such as Coach USA's Megabus and Greyhound's Boltbus take aim at the lucrative curbside business of so-called Chinatown operators.

Chinatown buses, which run from one city's Chinatown to another, offer an extremely popular curbside service, especially among 20-somethings looking for an inexpensive way to get wherever they are going. They also operate outside of terminals, saving companies millions in building and labor costs.

Megabus was first launched in the U.S. in April 2006. It offers cheaper fares the longer a ticket is booked in advance, with perks comparable to BoltBus. The highest fare tops out at \$27. The Chicago-based service expanded to the East Coast in May of this year, adding routes from New York to Washington D.C., Boston, Washington D.C., Philadelphia, Baltimore, Buffalo, N.Y.

Atlantic City, N.J. and Toronto.

But the carrier closed its hub in Los Angeles last month citing low ridership.

Coach USA President and Chief Operating Officer Dale Moser said the company saw the number of day passengers on its service surge 137 percent last year. He attributed part of the jump to the U.S. launch of Megabus.

Overall industry growth has been concentrated on the East Coast, where carriers are vying for the thriving business in major cities including New York, Washington and Boston.

"There is a remarkable, cutthroat battle for market share on the East Coast like nothing we've ever seen before," Schwieterman said.

While growth in bus service has been seen nationwide, Schwieterman said the eastern market is considered the most intense because of the presence of heavily populated cities that are more concentrated than in other parts of the country. He believes that one of the culprits that led to the shutdown of Megabus' Los Angeles hub was the fact that people without cars couldn't easily access the terminals.

Greyhound launched its low-cost service Boltbus earlier this year. The service began in late March from New York to Washington D.C., and in April from Philadelphia and Boston, running routes between the cities and New York. A ticket tops out at between \$15 and \$25 depending on the origination city. Both services say at least one seat (out of 50-plus) on each bus is \$1, but note there are sometimes more than one depending on the route.

Greyhound spokesman Dustin Clark said BoltBus is an answer to growing demand from students and other young people, but also a growing number of business travelers. And while BoltBus became profitable in May - ahead of the Dallas-based company's expectations - Greyhound's mainline ridership has remained flat over last year.

But Schwieterman noted that last year was a strong year for Greyhound, and for the nation's largest carrier, perhaps holding onto riders is a feat in itself.

"Its an achievement, nonetheless, to be flat in this economy," he said.

Schwieterman said Greyhound is also becoming "more aggressive and ambitious" following a

major overhaul last year. The company closed routes across the country in an effort to improve efficiency throughout its network.

The company is also spending more to advertise than ever before, he noted.

But the biggest recent move by Greyhound is undoubtedly the launch of BoltBus, he said, with those alluring \$1 fares.

But in the bitter battle for the East Coast, Schwieterman said it does not appear that Chinatown operators have pulled back either.

"It's a consumer's paradise right now, with cheap fares galore," Schwieterman said. "The incentives for taking the bus have never been better. And it comes at an interesting time, with airfares shooting up like a rocket."

wildcard=4109216/>Schwieterman said rising airfares are adding to existing concerns among consumers about rising gas prices. With gas topping \$4 per gallon, buses - especially discount carriers - are becoming increasingly attractive.

American Bus Association spokesman Eron Shosteck suggested that riders are also increasingly focused on reducing their carbon footprint, looking at buses as a greener alternative to cars.

Shosteck said this trend has continued as bus services revamp their fleets with more fuel-efficient motorcoaches with added creature comforts.

According to the association, motorcoaches get 184 passenger miles to the gallon, domestic air carriers reach about 42 passenger miles to the gallon and the average automobile gets 28 miles to the gallon.

Coach's Moser said the company is keenly focused on maintaining a fleet of newer, fuel-efficient fleet to reduce emissions.

Moser said the bus company is primarily getting people out of their cars, although he also sees frustration among his riders with the current state of the airlines.

And as the economy gets tighter, Moser suggests that the demand for bus services will continue to grow.

"People are looking for a simple way to get from Point A to Point B, and in this economy, buses are a great way to stretch that dollar." he said.

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EXHIBIT 9



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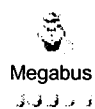

Bus tickets
from \$9


Buses with
free wifi
from \$9


Buses with
power outlets
from \$9

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Sort by Departure



Friday April 30
1:30am depart Penn Station, New York, NY
5:45am arrive South Station, Boston, MA
4hr 15min bus ride



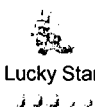
1 ticket for
\$10.00
[purchase](#)



Friday April 30
6:30am depart Chinatown, New York, NY
10:30am arrive South Station, Boston, MA
4hr bus ride



1 ticket for
\$15.00
[purchase](#)



Friday April 30
7:00am depart Chinatown, New York, NY
11:30am arrive South Station, Boston, MA
4hr 30min bus ride



1 ticket for
\$12.00
[purchase](#)



Friday April 30
7:00am depart Chinatown, New York, NY
11:00am arrive South Station, Boston, MA
4hr bus ride



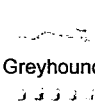
1 ticket for
\$15.00
[purchase](#)



Friday April 30
7:00am depart Penn Station, New York, NY
11:15am arrive South Station, Boston, MA
4hr 15min bus ride



1 ticket for
\$17.50
[purchase](#)



Friday April 30
7:00am depart Port Authority Bus Terminal, New York, NY
11:20am arrive South Station, Boston, MA
4hr 20min bus ride



1 ticket for
\$23.00
[purchase](#)



Friday April 30
7:10am depart Penn Station, New York, NY



1 ticket for

Megabus 11:25am arrive South Station, Boston, MA
4hr 15min bus ride

\$13.00[purchase](#)

Bolt Bus

Friday April 30
7:30am depart Penn Station, New York, NY
11:45am arrive South Station, Boston, MA
4hr 15min bus ride



1 ticket for
\$17.50

[purchase](#)

Lucky Star

Friday April 30
8:00am depart Chinatown, New York, NY
12:30pm arrive South Station, Boston, MA
4hr 30min bus ride



1 ticket for
\$12.00

[purchase](#)

Fung Wah

Friday April 30
8:00am depart Chinatown, New York, NY
12:00pm arrive South Station, Boston, MA
4hr bus ride



1 ticket for
\$15.00

[purchase](#)

Bolt Bus

Friday April 30
8:00am depart Penn Station, New York, NY
12:15pm arrive South Station, Boston, MA
4hr 15min bus ride

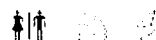


1 ticket for
\$17.50

[purchase](#)

Bolt Bus

Friday April 30
8:30am depart Penn Station, New York, NY
12:45pm arrive South Station, Boston, MA
4hr 15min bus ride



1 ticket for
\$17.50

[purchase](#)

Megabus

Friday April 30
8:45am depart Penn Station, New York, NY
1:00pm arrive South Station, Boston, MA
4hr 15min bus ride



1 ticket for
\$17.00

[purchase](#)

Fung Wah

Friday April 30
9:00am depart Chinatown, New York, NY
1:00pm arrive South Station, Boston, MA
4hr bus ride



1 ticket for
\$15.00

[purchase](#)

Lucky Star

Friday April 30
9:00am depart Chinatown, New York, NY
1:30pm arrive South Station, Boston, MA
4hr 30min bus ride



1 ticket for
\$15.00

[purchase](#)

Bolt Bus

Friday April 30
9:00am depart Penn Station, New York, NY
1:15pm arrive South Station, Boston, MA
4hr 15min bus ride



1 ticket for
\$18.50

[purchase](#)

Friday April 30
10:00am depart Chinatown, New York, NY



1 ticket for
\$12.00

Lucky Star **2:30pm** arrive South Station, Boston, MA
 4hr 30min bus ride

purchase

Fung Wah **Friday April 30**
10:00am depart Chinatown, New York, NY
2:00pm arrive South Station, Boston, MA
 4hr bus ride



1 ticket for
\$15.00
purchase

Bolt Bus **Friday April 30**
10:00am depart Penn Station, New York, NY
2:15pm arrive South Station, Boston, MA
 4hr 15min bus ride

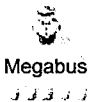


1 ticket for
\$17.50
purchase

Greyhound **Friday April 30**
10:00am depart Port Authority Bus Terminal, New York, NY
2:30pm arrive South Station, Boston, MA
 4hr 30min bus ride



1 ticket for
\$23.00
purchase

Megabus **Friday April 30**
10:15am depart Penn Station, New York, NY
2:30pm arrive South Station, Boston, MA
 4hr 15min bus ride



1 ticket for
\$17.00
purchase

Bolt Bus **Friday April 30**
10:30am depart Penn Station, New York, NY
2:45pm arrive South Station, Boston, MA
 4hr 15min bus ride



1 ticket for
\$18.50
purchase

Lucky Star **Friday April 30**
11:00am depart Chinatown, New York, NY
3:30pm arrive South Station, Boston, MA
 4hr 30min bus ride



1 ticket for
\$12.00
purchase

Fung Wah **Friday April 30**
11:00am depart Chinatown, New York, NY
3:00pm arrive South Station, Boston, MA
 4hr bus ride

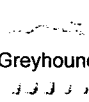


1 ticket for
\$15.00
purchase

Bolt Bus **Friday April 30**
11:00am depart Penn Station, New York, NY
3:15pm arrive South Station, Boston, MA
 4hr 15min bus ride



1 ticket for
\$18.50
purchase

Greyhound **Friday April 30**
11:00am depart Port Authority Bus Terminal, New York, NY
3:20pm arrive South Station, Boston, MA
 4hr 20min bus ride



1 ticket for
\$23.00
purchase

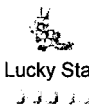
Bolt Bus **Friday April 30**
11:30am depart Penn Station, New York, NY
3:45pm arrive South Station, Boston, MA

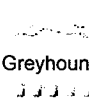


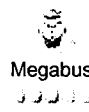
1 ticket for
\$17.50

 4hr 15min bus ride
purchase
 **Friday April 30**
11:30am depart Port Authority Bus Terminal, New York, NY
4:00pm arrive South Station, Boston, MA
 4hr 30min bus ride

 1 ticket for
\$23.00
purchase
 **Friday April 30**
12:00pm depart Chinatown, New York, NY
4:00pm arrive South Station, Boston, MA
 4hr bus ride

 1 ticket for
\$15.00
purchase
 **Friday April 30**
12:00pm depart Chinatown, New York, NY
4:30pm arrive South Station, Boston, MA
 4hr 30min bus ride

 1 ticket for
\$15.00
purchase
 **Friday April 30**
12:01pm depart Port Authority Bus Terminal, New York, NY
4:30pm arrive South Station, Boston, MA
 4hr 29min bus ride

 1 ticket for
\$23.00
purchase
 **Friday April 30**
12:15pm depart Penn Station, New York, NY
4:30pm arrive South Station, Boston, MA
 4hr 15min bus ride

 1 ticket for
\$15.00
purchase
 **Friday April 30**
12:30pm depart Chinatown, New York, NY
4:30pm arrive South Station, Boston, MA
 4hr bus ride

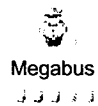
 1 ticket for
\$15.00
purchase
 **Friday April 30**
12:30pm depart Penn Station, New York, NY
4:45pm arrive South Station, Boston, MA
 4hr 15min bus ride

 1 ticket for
\$19.00
purchase
 **Friday April 30**
1:00pm depart Chinatown, New York, NY
5:00pm arrive South Station, Boston, MA
 4hr bus ride

 1 ticket for
\$15.00
purchase
 **Friday April 30**
1:00pm depart Chinatown, New York, NY
5:30pm arrive South Station, Boston, MA
 4hr 30min bus ride

 1 ticket for
\$15.00
purchase
 **Friday April 30**
1:00pm depart Penn Station, New York, NY
5:15pm arrive South Station, Boston, MA
 4hr 15min bus ride

 1 ticket for
\$17.50
purchase

	Friday April 30 1:00pm depart Port Authority Bus Terminal, New York, NY 5:20pm arrive South Station, Boston, MA 4hr 20min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 1:15pm depart Penn Station, New York, NY 5:30pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$15.00 purchase
	Friday April 30 1:30pm depart Chinatown, New York, NY 5:30pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 1:30pm depart Penn Station, New York, NY 5:45pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$18.50 purchase
	Friday April 30 1:30pm depart Port Authority Bus Terminal, New York, NY 6:00pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 2:00pm depart Chinatown, New York, NY 6:00pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 2:00pm depart Chinatown, New York, NY 6:30pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$15.00 purchase
	Friday April 30 2:00pm depart Penn Station, New York, NY 6:15pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$17.50 purchase
	Friday April 30 2:00pm depart Port Authority Bus Terminal, New York, NY 6:20pm arrive South Station, Boston, MA 4hr 20min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 2:15pm depart Penn Station, New York, NY 6:30pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$17.00 purchase

 Fung Wah JJJJJJ	Friday April 30 2:30pm depart Chinatown, New York, NY 6:30pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
 Bolt Bus JJJJJJ	Friday April 30 2:30pm depart Penn Station, New York, NY 6:45pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$18.50 purchase
 Fung Wah JJJJJJ	Friday April 30 3:00pm depart Chinatown, New York, NY 7:00pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
 Lucky Star JJJJJJ	Friday April 30 3:00pm depart Chinatown, New York, NY 7:30pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$15.00 purchase
 Bolt Bus JJJJJJ	Friday April 30 3:00pm depart Penn Station, New York, NY 7:15pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$18.50 purchase
 Greyhound JJJJJJ	Friday April 30 3:00pm depart Port Authority Bus Terminal, New York, NY 7:30pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$23.00 purchase
 Megabus JJJJJJ	Friday April 30 3:15pm depart Penn Station, New York, NY 7:30pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$17.00 purchase
 Fung Wah JJJJJJ	Friday April 30 3:30pm depart Chinatown, New York, NY 7:30pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
 Bolt Bus JJJJJJ	Friday April 30 3:30pm depart Penn Station, New York, NY 7:45pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$17.50 purchase
 Fung Wah JJJJJJ	Friday April 30 4:00pm depart Chinatown, New York, NY 8:00pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase

	Friday April 30 4:00pm depart Chinatown, New York, NY 8:30pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$15.00 purchase
	Friday April 30 4:00pm depart Penn Station, New York, NY 8:15pm arrive South Station, Boston, MA 4hr 15min bus ride	  	1 ticket for \$18.50 purchase
	Friday April 30 4:00pm depart Port Authority Bus Terminal, New York, NY 8:20pm arrive South Station, Boston, MA 4hr 20min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 4:30pm depart Chinatown, New York, NY 8:30pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 4:30pm depart Port Authority Bus Terminal, New York, NY 9:00pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 4:50pm depart Penn Station, New York, NY 9:05pm arrive South Station, Boston, MA 4hr 15min bus ride	  	1 ticket for \$17.00 purchase
	Friday April 30 5:00pm depart Chinatown, New York, NY 9:00pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 5:00pm depart Chinatown, New York, NY 9:30pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$15.00 purchase
	Friday April 30 5:00pm depart Penn Station, New York, NY 9:15pm arrive South Station, Boston, MA 4hr 15min bus ride	  	1 ticket for \$17.50 purchase
	Friday April 30 5:00pm depart Port Authority Bus Terminal, New York, NY 9:20pm arrive South Station, Boston, MA 4hr 20min bus ride		1 ticket for \$23.00 purchase

	Friday April 30 5:30pm depart Chinatown, New York, NY 9:30pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 5:30pm depart Penn Station, New York, NY 9:45pm arrive South Station, Boston, MA 4hr 15min bus ride	  	1 ticket for \$21.00 purchase
	Friday April 30 5:30pm depart Port Authority Bus Terminal, New York, NY 9:50pm arrive South Station, Boston, MA 4hr 20min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 5:50pm depart Penn Station, New York, NY 10:05pm arrive South Station, Boston, MA 4hr 15min bus ride	  	1 ticket for \$20.00 purchase
	Friday April 30 6:00pm depart Chinatown, New York, NY 10:00pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 6:00pm depart Chinatown, New York, NY 10:30pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$15.00 purchase
	Friday April 30 6:00pm depart Penn Station, New York, NY 10:15pm arrive South Station, Boston, MA 4hr 15min bus ride	  	1 ticket for \$21.00 purchase
	Friday April 30 6:00pm depart Port Authority Bus Terminal, New York, NY 10:30pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 6:30pm depart Chinatown, New York, NY 10:30pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 6:30pm depart Penn Station, New York, NY 10:45pm arrive South Station, Boston, MA 4hr 15min bus ride	  	1 ticket for \$21.00 purchase
	Friday April 30		1 ticket for

	6:30pm depart Port Authority Bus Terminal, New York, NY 10:50pm arrive South Station, Boston, MA 4hr 20min bus ride		\$23.00 purchase
	Friday April 30 6:50pm depart Penn Station, New York, NY 11:05pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$20.00 purchase
	Friday April 30 7:00pm depart Chinatown, New York, NY 11:00pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 7:00pm depart Chinatown, New York, NY 11:30pm arrive South Station, Boston, MA 4hr 30min bus ride		1 ticket for \$15.00 purchase
	Friday April 30 7:00pm depart Port Authority Bus Terminal, New York, NY 11:20pm arrive South Station, Boston, MA 4hr 20min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 7:30pm depart Chinatown, New York, NY 11:30pm arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 7:30pm depart Penn Station, New York, NY 11:45pm arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$21.00 purchase
	Friday April 30 7:30pm depart Port Authority Bus Terminal, New York, NY 11:59pm arrive South Station, Boston, MA 4hr 29min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 7:50pm depart Penn Station, New York, NY 12:05am arrive South Station, Boston, MA 4hr 15min bus ride		1 ticket for \$9.00 purchase
	Friday April 30 8:00pm depart Chinatown, New York, NY 12:00am arrive South Station, Boston, MA 4hr bus ride		1 ticket for \$15.00 purchase
	Friday April 30 8:00pm depart Chinatown, New York, NY		1 ticket for \$15.00

Lucky Star **12:30am** arrive South Station, Boston, MA
 4hr 30min bus ride

purchase



Bolt Bus
 4hr 15min bus ride

Friday April 30

8:30pm depart Penn Station, New York, NY
12:45am arrive South Station, Boston, MA



1 ticket for
\$17.50
purchase



Peter Pan
 4hr 20min bus ride

Friday April 30

8:30pm depart Port Authority Bus Terminal, New York, NY
12:50am arrive South Station, Boston, MA



1 ticket for
\$23.00
purchase



Megabus
 4hr 15min bus ride

Friday April 30

8:50pm depart Penn Station, New York, NY
1:05am arrive South Station, Boston, MA



1 ticket for
\$9.00
purchase



Fung Wah
 4hr bus ride

Friday April 30

9:00pm depart Chinatown, New York, NY
1:00am arrive South Station, Boston, MA



1 ticket for
\$15.00
purchase



Lucky Star
 4hr 30min bus ride

Friday April 30

9:00pm depart Chinatown, New York, NY
1:30am arrive South Station, Boston, MA



1 ticket for
\$15.00
purchase



Lucky Star
 4hr 30min bus ride

Friday April 30

10:00pm depart Chinatown, New York, NY
2:30am arrive South Station, Boston, MA



1 ticket for
\$12.00
purchase



Fung Wah
 4hr bus ride

Friday April 30

10:00pm depart Chinatown, New York, NY
2:00am arrive South Station, Boston, MA



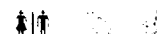
1 ticket for
\$15.00
purchase



Bolt Bus
 4hr 15min bus ride

Friday April 30

10:00pm depart Penn Station, New York, NY
2:15am arrive South Station, Boston, MA



1 ticket for
\$16.00
purchase



Megabus
 4hr 15min bus ride

Friday April 30

10:50pm depart Penn Station, New York, NY
3:05am arrive South Station, Boston, MA



1 ticket for
\$12.00
purchase



Fung Wah

Friday April 30

11:00pm depart Chinatown, New York, NY
3:00am arrive South Station, Boston, MA



1 ticket for
\$15.00



New York, NY → Washington, DC


Bus tickets
from \$1

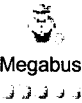
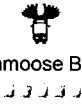
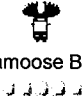
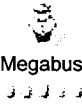

Buses with
free wifi
from \$1


Buses with
power outlets
from \$1

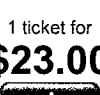
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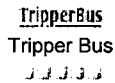
Sort by Departure

	Friday April 30 1:15am depart Penn Station, New York, NY 5:35am arrive Chinatown, Washington, DC 4hr 20min bus ride		1 ticket for \$1.00 purchase
	Friday April 30 1:30am depart Port Authority Bus Terminal, New York, NY 5:50am arrive Greyhound Bus Station, Washington, DC 4hr 20min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 6:30am depart Penn Station, New York, NY 11:00am arrive Chinatown, Washington, DC 4hr 30min bus ride		1 ticket for \$27.00 purchase
	Friday April 30 6:40am depart Penn Station, New York, NY 11:00am arrive Chinatown, Washington, DC 4hr 20min bus ride		1 ticket for \$19.00 purchase
	Friday April 30 7:00am depart Penn Station, New York, NY 11:15am arrive Chinatown, Washington, DC 4hr 15min bus ride		1 ticket for \$19.00 purchase
	Friday April 30 7:00am depart Port Authority Bus Terminal, New York, NY 11:30am arrive Greyhound Bus Station, Washington, DC 4hr 30min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 7:30am depart Penn Station, New York, NY		1 ticket for

	Bolt Bus 11:45am arrive Chinatown, Washington, DC 4hr 15min bus ride		\$19.00 purchase
	Friday April 30 8:00am depart Penn Station, New York, NY 12:20pm arrive Chinatown, Washington, DC 4hr 20min bus ride		1 ticket for \$17.00 purchase
	Friday April 30 8:15am depart Penn Station, New York, NY 12:30pm arrive Greenbelt Metrorail Station, Greenbelt, MD 4hr 15min bus ride		1 ticket for \$17.00 purchase
	Friday April 30 8:30am depart Penn Station, New York, NY 12:45pm arrive Union Station, Washington, DC 4hr 15min bus ride		1 ticket for \$15.00 purchase
	Friday April 30 8:30am depart Port Authority Bus Terminal, New York, NY 1:20pm arrive Greyhound Bus Station, Washington, DC 4hr 50min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 8:30am depart Penn Station, New York, NY 12:30pm arrive Downtown, Bethesda, MD 4hr bus ride		1 ticket for \$30.00 purchase
	Friday April 30 8:30am depart Penn Station, New York, NY 1:00pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride		1 ticket for \$30.00 purchase
	Friday April 30 8:45am depart Penn Station, New York, NY 1:15pm arrive Union Station, Washington, DC 4hr 30min bus ride		1 ticket for \$21.00 purchase
	Friday April 30 9:00am depart Penn Station, New York, NY 1:20pm arrive Chinatown, Washington, DC 4hr 20min bus ride		1 ticket for \$13.00 purchase
	Friday April 30 9:00am depart SoHo, New York, NY 12:45pm arrive Union Station, Washington, DC 3hr 45min bus ride		1 ticket for \$15.00 purchase
	Friday April 30 9:30am depart Penn Station, New York, NY		1 ticket for \$13.00

Megabus J J J J J	1:50pm arrive Chinatown, Washington, DC 4hr 20min bus ride		
Bolt Bus J J J J J	Friday April 30 9:30am depart Penn Station, New York, NY 1:45pm arrive Chinatown, Washington, DC 4hr 15min bus ride		1 ticket for \$19.00
Vamoose Bus J J J J J	Friday April 30 9:30am depart Penn Station, New York, NY 1:30pm arrive Downtown, Bethesda, MD 4hr bus ride		1 ticket for \$30.00
Vamoose Bus J J J J J	Friday April 30 9:30am depart Penn Station, New York, NY 2:00pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride		1 ticket for \$30.00
Bolt Bus J J J J J	Friday April 30 10:00am depart Penn Station, New York, NY 2:15pm arrive Union Station, Washington, DC 4hr 15min bus ride		1 ticket for \$15.00
Greyhound J J J J J	Friday April 30 10:00am depart Port Authority Bus Terminal, New York, NY 2:50pm arrive Greyhound Bus Station, Washington, DC 4hr 50min bus ride		1 ticket for \$23.00
TripperBus Tripper Bus J J J J J	Friday April 30 10:00am depart Penn Station, New York, NY 2:00pm arrive Downtown, Bethesda, MD 4hr bus ride		1 ticket for \$25.00
TripperBus Tripper Bus J J J J J	Friday April 30 10:00am depart Penn Station, New York, NY 2:30pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride		1 ticket for \$25.00
Bolt Bus J J J J J	Friday April 30 10:15am depart Penn Station, New York, NY 2:30pm arrive Greenbelt Metrorail Station, Greenbelt, MD 4hr 15min bus ride		1 ticket for \$17.00
Megabus J J J J J	Friday April 30 10:30am depart Penn Station, New York, NY 2:50pm arrive Chinatown, Washington, DC 4hr 20min bus ride		1 ticket for \$9.00
Bolt Bus J J J J J	Friday April 30 10:30am depart Penn Station, New York, NY 2:45pm arrive Chinatown, Washington, DC		1 ticket for \$19.00

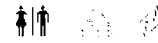
	4hr 15min bus ride	
	Friday April 30 10:30am depart Penn Station, New York, NY 2:30pm arrive Downtown, Bethesda, MD 4hr bus ride	
	Friday April 30 10:30am depart Penn Station, New York, NY 3:00pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride	
	Friday April 30 11:00am depart Penn Station, New York, NY 3:20pm arrive Chinatown, Washington, DC 4hr 20min bus ride	
	Friday April 30 11:00am depart Penn Station, New York, NY 3:30pm arrive Union Station, Washington, DC 4hr 30min bus ride	
	Friday April 30 11:00am depart Port Authority Bus Terminal, New York, NY 3:20pm arrive Greyhound Bus Station, Washington, DC 4hr 20min bus ride	
	Friday April 30 11:30am depart Penn Station, New York, NY 3:50pm arrive Chinatown, Washington, DC 4hr 20min bus ride	
	Friday April 30 11:30am depart Penn Station, New York, NY 3:45pm arrive Union Station, Washington, DC 4hr 15min bus ride	
	Friday April 30 11:30am depart Port Authority Bus Terminal, New York, NY 4:00pm arrive Greyhound Bus Station, Washington, DC 4hr 30min bus ride	
	Friday April 30 11:45am depart Penn Station, New York, NY 4:15pm arrive Chinatown, Washington, DC 4hr 30min bus ride	
	Friday April 30 12:00pm depart Penn Station, New York, NY 4:00pm arrive Downtown, Bethesda, MD 4hr bus ride	



Friday April 30

12:00pm depart Penn Station, New York, NY
4:30pm arrive Rosslyn, Arlington, VA

4hr 30min bus ride



1 ticket for
\$25.00
 purchase



Friday April 30

12:00pm depart Penn Station, New York, NY
4:00pm arrive Downtown, Bethesda, MD

4hr bus ride



1 ticket for
\$30.00
 purchase



Friday April 30

12:00pm depart Penn Station, New York, NY
4:30pm arrive Rosslyn, Arlington, VA

4hr 30min bus ride



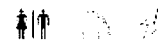
1 ticket for
\$30.00
 purchase



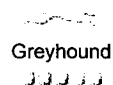
Friday April 30

12:01pm depart Penn Station, New York, NY
4:15pm arrive Chinatown, Washington, DC

4hr 14min bus ride



1 ticket for
\$19.00
 purchase



Friday April 30

12:01pm depart Port Authority Bus Terminal, New York, NY
4:50pm arrive Greyhound Bus Station, Washington, DC

4hr 49min bus ride



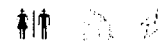
1 ticket for
\$23.00
 purchase



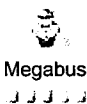
Friday April 30

12:15pm depart Penn Station, New York, NY
4:30pm arrive Greenbelt Metrorail Station, Greenbelt, MD

4hr 15min bus ride



1 ticket for
\$17.00
 purchase



Friday April 30

12:30pm depart Penn Station, New York, NY
4:50pm arrive Chinatown, Washington, DC

4hr 20min bus ride



1 ticket for
\$9.00
 purchase



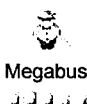
Friday April 30

12:30pm depart Penn Station, New York, NY
4:45pm arrive Chinatown, Washington, DC

4hr 15min bus ride



1 ticket for
\$19.00
 purchase



Friday April 30

1:00pm depart Penn Station, New York, NY
5:20pm arrive Chinatown, Washington, DC

4hr 20min bus ride



1 ticket for
\$9.00
 purchase



Friday April 30

1:00pm depart Penn Station, New York, NY
5:15pm arrive Chinatown, Washington, DC

4hr 15min bus ride



1 ticket for
\$19.00
 purchase



Friday April 30

1:00pm depart Port Authority Bus Terminal, New York, NY
5:50pm arrive Greyhound Bus Station, Washington, DC
 4hr 50min bus ride



1 ticket for
\$23.00
[purchase](#)



Bolt Bus
 JJJJJ

Friday April 30

1:15pm depart Penn Station, New York, NY
5:30pm arrive Greenbelt Metrorail Station, Greenbelt, MD
 4hr 15min bus ride



1 ticket for
\$17.00
[purchase](#)



Megabus
 JJJJJ

Friday April 30

1:30pm depart Penn Station, New York, NY
5:50pm arrive Chinatown, Washington, DC
 4hr 20min bus ride



1 ticket for
\$9.00
[purchase](#)



Bolt Bus
 JJJJJ

Friday April 30

1:30pm depart Penn Station, New York, NY
5:45pm arrive Chinatown, Washington, DC
 4hr 15min bus ride



1 ticket for
\$19.00
[purchase](#)



Friday April 30

1:30pm depart Port Authority Bus Terminal, New York, NY
5:50pm arrive Greyhound Bus Station, Washington, DC
 4hr 20min bus ride



1 ticket for
\$23.00
[purchase](#)



Megabus
 JJJJJ

Friday April 30

2:00pm depart Penn Station, New York, NY
6:20pm arrive Chinatown, Washington, DC
 4hr 20min bus ride



1 ticket for
\$13.00
[purchase](#)



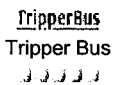
Bolt Bus
 JJJJJ

Friday April 30

2:00pm depart Penn Station, New York, NY
6:15pm arrive Chinatown, Washington, DC
 4hr 15min bus ride



1 ticket for
\$19.00
[purchase](#)

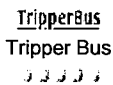


Friday April 30

2:00pm depart Penn Station, New York, NY
6:00pm arrive Downtown, Bethesda, MD
 4hr bus ride



1 ticket for
\$25.00
[purchase](#)



Friday April 30

2:00pm depart Penn Station, New York, NY
6:30pm arrive Rosslyn, Arlington, VA
 4hr 30min bus ride



1 ticket for
\$25.00
[purchase](#)



Vamoose Bus
 JJJJJ

Friday April 30

2:00pm depart Penn Station, New York, NY
6:00pm arrive Downtown, Bethesda, MD
 4hr bus ride



1 ticket for
\$30.00
[purchase](#)



Friday April 30
2:00pm depart Penn Station, New York, NY
6:30pm arrive Rosslyn, Arlington, VA
 4hr 30min bus ride



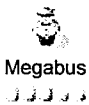
1 ticket for
\$30.00
[purchase](#)



Friday April 30
2:15pm depart Penn Station, New York, NY
6:45pm arrive Greenbelt Metrorail Station, Greenbelt, MD
 4hr 30min bus ride



1 ticket for
\$17.00
[purchase](#)



Friday April 30
2:30pm depart Penn Station, New York, NY
6:50pm arrive Chinatown, Washington, DC
 4hr 20min bus ride



1 ticket for
\$9.00
[purchase](#)



Friday April 30
2:30pm depart Penn Station, New York, NY
7:00pm arrive Union Station, Washington, DC
 4hr 30min bus ride



1 ticket for
\$15.00
[purchase](#)



Friday April 30
2:30pm depart Port Authority Bus Terminal, New York, NY
7:20pm arrive Greyhound Bus Station, Washington, DC
 4hr 50min bus ride



1 ticket for
\$23.00
[purchase](#)



Friday April 30
3:00pm depart Penn Station, New York, NY
7:20pm arrive Chinatown, Washington, DC
 4hr 20min bus ride



1 ticket for
\$13.00
[purchase](#)



Friday April 30
3:00pm depart SoHo, New York, NY
7:00pm arrive Union Station, Washington, DC
 4hr bus ride



1 ticket for
\$15.00
[purchase](#)



Friday April 30
3:15pm depart Penn Station, New York, NY
7:45pm arrive Greenbelt Metrorail Station, Greenbelt, MD
 4hr 30min bus ride



1 ticket for
\$19.00
[purchase](#)



Friday April 30
3:30pm depart Penn Station, New York, NY
7:45pm arrive Chinatown, Washington, DC
 4hr 15min bus ride



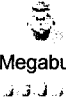
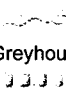
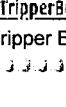
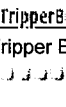
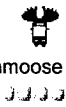
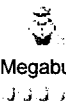
1 ticket for
\$23.00
[purchase](#)



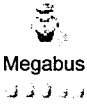
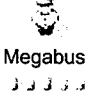
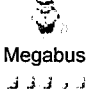
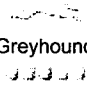
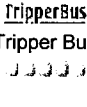
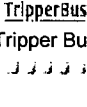
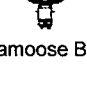
Friday April 30
3:30pm depart Port Authority Bus Terminal, New York, NY
7:50pm arrive Greyhound Bus Station, Washington, DC
 4hr 20min bus ride



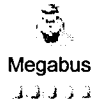
1 ticket for
\$23.00
[purchase](#)

 Megabus	Friday April 30 4:00pm depart Penn Station, New York, NY 8:20pm arrive Chinatown, Washington, DC 4hr 20min bus ride		1 ticket for \$19.00 purchase
 Bolt Bus	Friday April 30 4:00pm depart Penn Station, New York, NY 8:15pm arrive Union Station, Washington, DC 4hr 15min bus ride		1 ticket for \$21.00 purchase
 Greyhound	Friday April 30 4:00pm depart Port Authority Bus Terminal, New York, NY 8:30pm arrive Greyhound Bus Station, Washington, DC 4hr 30min bus ride		1 ticket for \$23.00 purchase
 Tripper Bus	Friday April 30 4:00pm depart Penn Station, New York, NY 8:00pm arrive Downtown, Bethesda, MD 4hr bus ride		1 ticket for \$25.00 purchase
 Tripper Bus	Friday April 30 4:00pm depart Penn Station, New York, NY 8:30pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride		1 ticket for \$25.00 purchase
 Vamoose Bus	Friday April 30 4:00pm depart Penn Station, New York, NY 8:00pm arrive Downtown, Bethesda, MD 4hr bus ride		1 ticket for \$30.00 purchase
 Vamoose Bus	Friday April 30 4:00pm depart Penn Station, New York, NY 8:30pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride		1 ticket for \$30.00 purchase
 Bolt Bus	Friday April 30 4:15pm depart Penn Station, New York, NY 8:30pm arrive Greenbelt Metrorail Station, Greenbelt, MD 4hr 15min bus ride		1 ticket for \$17.00 purchase
 Megabus	Friday April 30 4:30pm depart Penn Station, New York, NY 8:50pm arrive Chinatown, Washington, DC 4hr 20min bus ride		1 ticket for \$17.00 purchase
 Bolt Bus	Friday April 30 4:30pm depart Penn Station, New York, NY 8:45pm arrive Chinatown, Washington, DC 4hr 15min bus ride		1 ticket for \$21.00 purchase
 Megabus	Friday April 30		1 ticket for

	5:00pm depart Penn Station, New York, NY 9:20pm arrive Chinatown, Washington, DC 4hr 20min bus ride		\$21.00 purchase
	Friday April 30 5:00pm depart Penn Station, New York, NY 9:15pm arrive Chinatown, Washington, DC 4hr 15min bus ride		1 ticket for \$21.00 purchase
	Friday April 30 5:00pm depart Port Authority Bus Terminal, New York, NY 9:30pm arrive Greyhound Bus Station, Washington, DC 4hr 30min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 5:30pm depart Penn Station, New York, NY 9:50pm arrive Chinatown, Washington, DC 4hr 20min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 5:30pm depart Penn Station, New York, NY 9:45pm arrive Union Station, Washington, DC 4hr 15min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 5:30pm depart Port Authority Bus Terminal, New York, NY 10:20pm arrive Greyhound Bus Station, Washington, DC 4hr 50min bus ride		1 ticket for \$23.00 purchase
	Friday April 30 5:30pm depart Penn Station, New York, NY 9:30pm arrive Downtown, Bethesda, MD 4hr bus ride		1 ticket for \$25.00 purchase
	Friday April 30 5:30pm depart Penn Station, New York, NY 10:00pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride		1 ticket for \$25.00 purchase
	Friday April 30 5:30pm depart Penn Station, New York, NY 9:30pm arrive Downtown, Bethesda, MD 4hr bus ride		1 ticket for \$30.00 purchase
	Friday April 30 5:30pm depart Penn Station, New York, NY 10:00pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride		1 ticket for \$30.00 purchase
	Friday April 30 5:40pm depart Penn Station, New York, NY		1 ticket for \$27.00

	10:25pm arrive Chinatown, Washington, DC 4hr 45min bus ride		
	Friday April 30 6:00pm depart Port Authority Bus Terminal, New York, NY 10:20pm arrive Greyhound Bus Station, Washington, DC 4hr 20min bus ride		1 ticket for \$23.00 
	Friday April 30 6:00pm depart Penn Station, New York, NY 10:20pm arrive Chinatown, Washington, DC 4hr 20min bus ride	  	1 ticket for \$25.00 
	Friday April 30 6:15pm depart Penn Station, New York, NY 10:30pm arrive Greenbelt Metrorail Station, Greenbelt, MD 4hr 15min bus ride	  	1 ticket for \$19.00 
	Friday April 30 6:30pm depart Penn Station, New York, NY 10:45pm arrive Chinatown, Washington, DC 4hr 15min bus ride	  	1 ticket for \$21.00 
	Friday April 30 6:30pm depart Penn Station, New York, NY 10:50pm arrive Chinatown, Washington, DC 4hr 20min bus ride	  	1 ticket for \$23.00 
	Friday April 30 7:00pm depart Penn Station, New York, NY 11:20pm arrive Chinatown, Washington, DC 4hr 20min bus ride	  	1 ticket for \$23.00 
	Friday April 30 7:00pm depart Port Authority Bus Terminal, New York, NY 11:30pm arrive Greyhound Bus Station, Washington, DC 4hr 30min bus ride		1 ticket for \$23.00 
	Friday April 30 7:00pm depart Penn Station, New York, NY 11:00pm arrive Downtown, Bethesda, MD 4hr bus ride	  	1 ticket for \$25.00 
	Friday April 30 7:00pm depart Penn Station, New York, NY 11:30pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride	  	1 ticket for \$25.00 
	Friday April 30 7:00pm depart Penn Station, New York, NY 11:00pm arrive Downtown, Bethesda, MD		1 ticket for \$30.00

	4hr bus ride		
 Vamoose Bus 	Friday April 30 7:00pm depart Penn Station, New York, NY 11:30pm arrive Rosslyn, Arlington, VA 4hr 30min bus ride		1 ticket for \$30.00 
 Bolt Bus 	Friday April 30 7:15pm depart Penn Station, New York, NY 11:30pm arrive Greenbelt Metrorail Station, Greenbelt, MD 4hr 15min bus ride	  	1 ticket for \$17.00 
 Megabus 	Friday April 30 7:30pm depart Penn Station, New York, NY 11:50pm arrive Chinatown, Washington, DC 4hr 20min bus ride	  	1 ticket for \$9.00 
 Bolt Bus 	Friday April 30 7:30pm depart Penn Station, New York, NY 11:59pm arrive Chinatown, Washington, DC 4hr 29min bus ride	  	1 ticket for \$19.00 
 Bolt Bus 	Friday April 30 8:00pm depart SoHo, New York, NY 11:59pm arrive Chinatown, Washington, DC 3hr 59min bus ride	  	1 ticket for \$19.00 
 Bolt Bus 	Friday April 30 8:15pm depart Penn Station, New York, NY 12:30am arrive Greenbelt Metrorail Station, Greenbelt, MD 4hr 15min bus ride	  	1 ticket for \$17.00 
 Bolt Bus 	Friday April 30 8:30pm depart Penn Station, New York, NY 12:45am arrive Chinatown, Washington, DC 4hr 15min bus ride	  	1 ticket for \$19.00 
 Megabus 	Friday April 30 9:00pm depart Penn Station, New York, NY 1:20am arrive Chinatown, Washington, DC 4hr 20min bus ride	  	1 ticket for \$9.00 
 Peter Pan 	Friday April 30 9:00pm depart Port Authority Bus Terminal, New York, NY 1:45am arrive Greyhound Bus Station, Washington, DC 4hr 45min bus ride		1 ticket for \$23.00 
 Bolt Bus 	Friday April 30 10:00pm depart Penn Station, New York, NY 2:15am arrive Chinatown, Washington, DC 4hr 15min bus ride	  	1 ticket for \$16.00 



Friday April 30
11:00pm depart Penn Station, New York, NY
3:20am arrive Chinatown, Washington, DC
 4hr 20min bus ride



1 ticket for
\$8.00
 purchase



Friday April 30
11:59pm depart Penn Station, New York, NY
4:15am arrive Chinatown, Washington, DC
 4hr 16min bus ride



1 ticket for
\$16.00
 purchase

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Sort by Departure

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New York, NY → Philadelphia, PA

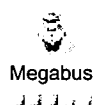

Bus tickets
from \$5


Buses with
free wifi
from \$5


Buses with
power outlets
from \$5

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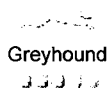
Sort by Departure



Friday April 30
1:15am depart Penn Station, New York, NY
3:05am arrive 30th Street Station, Philadelphia, PA
1hr 50min bus ride



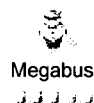
1 ticket for
\$7.00
[purchase](#)



Friday April 30
3:15am depart Port Authority Bus Terminal, New York, NY
5:20am arrive Greyhound Bus Station, Philadelphia, PA
2hr 5min bus ride



1 ticket for
\$12.00
[purchase](#)



Friday April 30
6:30am depart Penn Station, New York, NY
8:30am arrive 30th Street Station, Philadelphia, PA
2hr bus ride



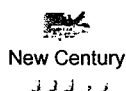
1 ticket for
\$5.00
[purchase](#)



Friday April 30
7:00am depart Chinatown, New York, NY
9:00am arrive Chinatown, Philadelphia, PA
2hr bus ride



1 ticket for
\$10.00
[purchase](#)



Friday April 30
7:00am depart Chinatown, New York, NY
9:00am arrive Chinatown, Philadelphia, PA
2hr bus ride



1 ticket for
\$12.00
[purchase](#)



Friday April 30
7:00am depart Port Authority Bus Terminal, New York, NY
9:10am arrive Greyhound Bus Station, Philadelphia, PA
2hr 10min bus ride



1 ticket for
\$12.00
[purchase](#)



Friday April 30
7:30am depart Penn Station, New York, NY



1 ticket for

Bolt Bus
 **9:10am** arrive Cherry Hill Mall, Cherry Hill, NJ
 1hr 40min bus ride

\$8.00**purchase**

Bolt Bus
 **Friday April 30**
7:30am depart Penn Station, New York, NY
9:30am arrive 30th Street Station, Philadelphia, PA
 2hr bus ride



1 ticket for

\$8.00**purchase**

Eastern Travel


Friday April 30
8:00am depart Chinatown, New York, NY
10:00am arrive Chinatown, Philadelphia, PA
 2hr bus ride



1 ticket for

\$10.00**purchase**

New Century


Friday April 30
8:00am depart Chinatown, New York, NY
10:00am arrive Chinatown, Philadelphia, PA
 2hr bus ride



1 ticket for

\$12.00**purchase**

Bolt Bus
 **Friday April 30**
8:30am depart Penn Station, New York, NY
10:10am arrive Cherry Hill Mall, Cherry Hill, NJ
 1hr 40min bus ride



1 ticket for

\$10.00**purchase**

Bolt Bus
 **Friday April 30**
8:30am depart Penn Station, New York, NY
10:30am arrive 30th Street Station, Philadelphia, PA
 2hr bus ride



1 ticket for

\$10.00**purchase**

New Century


Friday April 30
8:30am depart Chinatown, New York, NY
10:30am arrive Chinatown, Philadelphia, PA
 2hr bus ride



1 ticket for

\$12.00**purchase**

Eastern Travel


Friday April 30
9:00am depart Chinatown, New York, NY
11:00am arrive Chinatown, Philadelphia, PA
 2hr bus ride



1 ticket for

\$10.00**purchase**

New Century


Friday April 30
9:00am depart Chinatown, New York, NY
11:00am arrive Chinatown, Philadelphia, PA
 2hr bus ride



1 ticket for

\$12.00**purchase**

Bolt Bus
 **Friday April 30**
9:30am depart Penn Station, New York, NY
11:45am arrive 30th Street Station, Philadelphia, PA
 2hr 15min bus ride



1 ticket for

\$10.00**purchase**

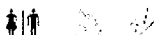
New Century


Friday April 30
9:30am depart Chinatown, New York, NY



1 ticket for

\$12.00

	11:30am arrive Chinatown, Philadelphia, PA 2hr bus ride			1 ticket for \$7.00 purchase
	Friday April 30 9:45am depart Penn Station, New York, NY 11:45am arrive 30th Street Station, Philadelphia, PA 2hr bus ride			
	Friday April 30 9:45am depart SoHo, New York, NY 11:45am arrive 30th Street Station, Philadelphia, PA 2hr bus ride			1 ticket for \$10.00 purchase
	Friday April 30 10:00am depart Penn Station, New York, NY 12:15pm arrive 30th Street Station, Philadelphia, PA 2hr 15min bus ride			1 ticket for \$8.00 purchase
	Friday April 30 10:00am depart Chinatown, New York, NY 12:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride			1 ticket for \$12.00 purchase
	Friday April 30 10:30am depart Penn Station, New York, NY 12:10pm arrive Cherry Hill Mall, Cherry Hill, NJ 1hr 40min bus ride			1 ticket for \$8.00 purchase
	Friday April 30 10:30am depart Penn Station, New York, NY 12:30pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride			1 ticket for \$8.00 purchase
	Friday April 30 10:30am depart Chinatown, New York, NY 12:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride			1 ticket for \$10.00 purchase
	Friday April 30 10:45am depart Penn Station, New York, NY 12:45pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride			1 ticket for \$7.00 purchase
	Friday April 30 11:00am depart Penn Station, New York, NY 1:00pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride			1 ticket for \$8.00 purchase
	Friday April 30 11:00am depart Chinatown, New York, NY 1:00pm arrive Chinatown, Philadelphia, PA			1 ticket for \$12.00

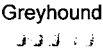
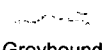
	2hr bus ride		
	Friday April 30 11:30am depart Penn Station, New York, NY 1:30pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$8.00
	Friday April 30 11:30am depart Chinatown, New York, NY 1:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00
	Friday April 30 11:30am depart Port Authority Bus Terminal, New York, NY 1:40pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride		1 ticket for \$12.00
	Friday April 30 11:45am depart Penn Station, New York, NY 1:45pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$5.00
	Friday April 30 12:00pm depart Penn Station, New York, NY 2:00pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$8.00
	Friday April 30 12:00pm depart Chinatown, New York, NY 2:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00
	Friday April 30 12:01pm depart Port Authority Bus Terminal, New York, NY 2:10pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 9min bus ride		1 ticket for \$12.00
	Friday April 30 12:15pm depart Chinatown, New York, NY 2:15pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$10.00
	Friday April 30 12:30pm depart Penn Station, New York, NY 2:10pm arrive Cherry Hill Mall, Cherry Hill, NJ 1hr 40min bus ride		1 ticket for \$10.00
	Friday April 30 12:30pm depart Penn Station, New York, NY 2:30pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$10.00

 New Century ★★★★	Friday April 30 12:30pm depart Chinatown, New York, NY 2:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Megabus ★★★★	Friday April 30 12:45pm depart Penn Station, New York, NY 2:45pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride	  	1 ticket for \$7.00 purchase
 New Century ★★★★	Friday April 30 1:00pm depart Chinatown, New York, NY 3:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Eastern Travel ★★★★	Friday April 30 1:15pm depart Chinatown, New York, NY 3:15pm arrive Chinatown, Philadelphia, PA 2hr bus ride	 	1 ticket for \$10.00 purchase
 New Century ★★★★	Friday April 30 1:30pm depart Chinatown, New York, NY 3:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Megabus ★★★★	Friday April 30 1:45pm depart Penn Station, New York, NY 3:45pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride	  	1 ticket for \$7.00 purchase
 Bolt Bus ★★★★	Friday April 30 1:45pm depart Penn Station, New York, NY 4:15pm arrive 30th Street Station, Philadelphia, PA 2hr 30min bus ride	  	1 ticket for \$10.00 purchase
 New Century ★★★★	Friday April 30 2:00pm depart Chinatown, New York, NY 4:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Greyhound ★★★★	Friday April 30 2:00pm depart Port Authority Bus Terminal, New York, NY 4:10pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride		1 ticket for \$12.00 purchase
 Bolt Bus ★★★★	Friday April 30 2:15pm depart SoHo, New York, NY 4:15pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride	  	1 ticket for \$10.00 purchase

 Eastern Travel 	Friday April 30 2:15pm depart Chinatown, New York, NY 4:15pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$10.00 purchase
 Bolt Bus 	Friday April 30 2:30pm depart Penn Station, New York, NY 4:30pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 New Century 	Friday April 30 2:30pm depart Chinatown, New York, NY 4:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Peter Pan 	Friday April 30 2:30pm depart Port Authority Bus Terminal, New York, NY 4:40pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride		1 ticket for \$12.00 purchase
 Megabus 	Friday April 30 2:45pm depart Penn Station, New York, NY 4:45pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$7.00 purchase
 New Century 	Friday April 30 3:00pm depart Chinatown, New York, NY 5:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Bolt Bus 	Friday April 30 3:15pm depart Penn Station, New York, NY 4:55pm arrive Cherry Hill Mall, Cherry Hill, NJ 1hr 40min bus ride		1 ticket for \$13.00 purchase
 Bolt Bus 	Friday April 30 3:15pm depart Penn Station, New York, NY 5:15pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$13.00 purchase
 New Century 	Friday April 30 3:30pm depart Chinatown, New York, NY 5:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Megabus 	Friday April 30 3:45pm depart Penn Station, New York, NY 5:45pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$7.00 purchase

 Eastern Travel ★★★★	Friday April 30 3:45pm depart Chinatown, New York, NY 5:45pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$10.00 purchase
 Bolt Bus ★★★★	Friday April 30 3:45pm depart Penn Station, New York, NY 5:45pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 New Century ★★★★	Friday April 30 4:00pm depart Chinatown, New York, NY 6:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Peter Pan ★★★★	Friday April 30 4:00pm depart Port Authority Bus Terminal, New York, NY 6:10pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride		1 ticket for \$12.00 purchase
 Bolt Bus ★★★★	Friday April 30 4:15pm depart Penn Station, New York, NY 5:55pm arrive Cherry Hill Mall, Cherry Hill, NJ 1hr 40min bus ride		1 ticket for \$12.00 purchase
 Bolt Bus ★★★★	Friday April 30 4:15pm depart Penn Station, New York, NY 6:15pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Bolt Bus ★★★★	Friday April 30 4:30pm depart Penn Station, New York, NY 6:30pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$10.00 purchase
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 New Century ★★★★	Friday April 30 4:30pm depart Chinatown, New York, NY 6:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Greyhound ★★★★	Friday April 30 4:30pm depart Port Authority Bus Terminal, New York, NY 6:30pm arrive Greyhound Bus Station, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase

 Megabus ★★★★	Friday April 30 4:40pm depart Penn Station, New York, NY 6:40pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$7.00 purchase
 Bolt Bus ★★★★	Friday April 30 5:00pm depart Penn Station, New York, NY 6:40pm arrive Cherry Hill Mall, Cherry Hill, NJ 1hr 40min bus ride		1 ticket for \$12.00 purchase
 Bolt Bus ★★★★	Friday April 30 5:00pm depart Penn Station, New York, NY 7:00pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 New Century ★★★★	Friday April 30 5:00pm depart Chinatown, New York, NY 7:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Greyhound ★★★★	Friday April 30 5:00pm depart Port Authority Bus Terminal, New York, NY 7:10pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride		1 ticket for \$12.00 purchase
 Eastern Travel ★★★★	Friday April 30 5:30pm depart Chinatown, New York, NY 7:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$10.00 purchase
 New Century ★★★★	Friday April 30 5:30pm depart Chinatown, New York, NY 7:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Megabus ★★★★	Friday April 30 5:40pm depart Penn Station, New York, NY 7:40pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$11.00 purchase
 Bolt Bus ★★★★	Friday April 30 5:45pm depart Penn Station, New York, NY 7:45pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride		1 ticket for \$13.00 purchase
 New Century ★★★★	Friday April 30 6:00pm depart Chinatown, New York, NY 8:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 purchase
 Greyhound ★★★★	Friday April 30		1 ticket for

 Greyhound 	6:00pm depart Port Authority Bus Terminal, New York, NY 8:10pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride		\$12.00 
 Bolt Bus 	Friday April 30 6:15pm depart Penn Station, New York, NY 7:55pm arrive Cherry Hill Mall, Cherry Hill, NJ 1hr 40min bus ride	  	1 ticket for \$13.00 
 Bolt Bus 	Friday April 30 6:15pm depart Penn Station, New York, NY 8:15pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride	  	1 ticket for \$13.00 
 New Century 	Friday April 30 6:30pm depart Chinatown, New York, NY 8:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 
 Greyhound 	Friday April 30 6:30pm depart Port Authority Bus Terminal, New York, NY 8:40pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride		1 ticket for \$12.00 
 Megabus 	Friday April 30 6:40pm depart Penn Station, New York, NY 8:40pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride	  	1 ticket for \$7.00 
 New Century 	Friday April 30 7:00pm depart Chinatown, New York, NY 9:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 
 Greyhound 	Friday April 30 7:00pm depart Port Authority Bus Terminal, New York, NY 9:00pm arrive Greyhound Bus Station, Philadelphia, PA 2hr bus ride		1 ticket for \$12.00 
 Bolt Bus 	Friday April 30 7:00pm depart Penn Station, New York, NY 9:15pm arrive 30th Street Station, Philadelphia, PA 2hr 15min bus ride	  	1 ticket for \$13.00 
 Eastern Travel 	Friday April 30 7:30pm depart Chinatown, New York, NY 9:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride	 	1 ticket for \$10.00 
 New Century	Friday April 30 7:30pm depart Chinatown, New York, NY		1 ticket for \$12.00

	9:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride			1 ticket for \$7.00 purchase
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	Friday April 30 8:00pm depart Penn Station, New York, NY 10:15pm arrive 30th Street Station, Philadelphia, PA 2hr 15min bus ride			1 ticket for \$13.00 purchase
	Friday April 30 8:30pm depart Chinatown, New York, NY 10:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride			1 ticket for \$12.00 purchase
	Friday April 30 8:30pm depart Port Authority Bus Terminal, New York, NY 10:30pm arrive Greyhound Bus Station, Philadelphia, PA 2hr bus ride			1 ticket for \$12.00 purchase
	Friday April 30 8:30pm depart SoHo, New York, NY 10:15pm arrive 30th Street Station, Philadelphia, PA 1hr 45min bus ride			1 ticket for \$13.00 purchase
	Friday April 30 8:40pm depart Penn Station, New York, NY 10:40pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride			1 ticket for \$7.00 purchase
	Friday April 30 9:00pm depart Chinatown, New York, NY 11:00pm arrive Chinatown, Philadelphia, PA 2hr bus ride			1 ticket for \$12.00 purchase
	Friday April 30 9:30pm depart Penn Station, New York, NY 10:55pm arrive Cherry Hill Mall, Cherry Hill, NJ 1hr 25min bus ride			1 ticket for \$12.00 purchase
	Friday April 30 9:30pm depart Penn Station, New York, NY 11:15pm arrive 30th Street Station, Philadelphia, PA			1 ticket for \$12.00

	1hr 45min bus ride	
	Friday April 30 9:30pm depart Chinatown, New York, NY 11:30pm arrive Chinatown, Philadelphia, PA 2hr bus ride	 1 ticket for \$12.00 
	Friday April 30 9:30pm depart Port Authority Bus Terminal, New York, NY 11:40pm arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride	 1 ticket for \$12.00 
	Friday April 30 9:40pm depart Penn Station, New York, NY 11:40pm arrive 30th Street Station, Philadelphia, PA 2hr bus ride	   1 ticket for \$5.00 
	Friday April 30 10:00pm depart Chinatown, New York, NY 12:00am arrive Chinatown, Philadelphia, PA 2hr bus ride	 1 ticket for \$12.00 
	Friday April 30 10:00pm depart Port Authority Bus Terminal, New York, NY 12:10am arrive Greyhound Bus Station, Philadelphia, PA 2hr 10min bus ride	 1 ticket for \$12.00 
	Friday April 30 10:15pm depart Penn Station, New York, NY 12:15am arrive 30th Street Station, Philadelphia, PA 2hr bus ride	   1 ticket for \$8.00 
	Friday April 30 11:00pm depart Chinatown, New York, NY 1:00am arrive Chinatown, Philadelphia, PA 2hr bus ride	 1 ticket for \$12.00 
	Friday April 30 11:45pm depart Penn Station, New York, NY 1:45am arrive 30th Street Station, Philadelphia, PA 2hr bus ride	   1 ticket for \$5.00 

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EXHIBIT 10

The Washington Times Close Print

Wednesday, June 24, 2009

Bus trips rediscovered by young, hip

Gabriella Boston

The bus -- previously the antithesis of urban chic -- has become just that. Intercity bus take the young and hip between destinations such as New York and the District have huge market share, while air and car travel are hurting. Intercity buses saw a 9.8 percent increase in departures between 2007 and 2008, while miles traveled by car went down 1.5 percent and miles traveled by air went down 8 percent in the same period. (Train travel saw a 3.3 percent increase.)

Experts cite a confluence of four factors behind the transformation: digitally connected youngsters, inner-city revitalization, new bus design and online ticketing, says Joseph Schwieterman, a professor of public service at DePaul University who specializes in urban transportation issues.

"Young urban dwellers don't have any particular attachment or affinity for the car," Mr. Schwieterman says. "For them, the intercity buses have become almost an extension of the public transit system. They're a low-cost, flexible way to go from Washington to New York."

The tech-savvy young (30 and younger) have become one of the most important markets for intercity buses such as Megabus and Boltbus. (Yes, we know you've seen them downtown with their bright, bold branding is hard to miss.) Both bus lines provide plug-ins for digital devices and free Wi-Fi - which certainly doesn't hurt their appeal to this younger demographic.

Both companies started their Washington-New York City routes in spring 2008, and both report bigger-than-expected ridership expansion.

"We're continuing to see phenomenal growth in the market," says Dale Moser, chief operating officer and president of Megabus, which saw more than 420,000 riders in its year between the two major cities. "People are looking to stretch their dollar."

Both Boltbus and Megabus offer at least one \$1 ticket per departure. (The highest-price tickets go for \$20 to \$25 one way, depending on the company.) "If you get the guaranteed fare, you get to travel for less than the price of a cup of coffee," says Abby Wambaugh, spokeswoman for Boltbus and its parent, Greyhound. "You can't beat that."

The buses also have found favor with 30- to 55-year-old women going with friends to see a show, Mr. Moser says. These women have cars; they just don't want the hassle of driving them.

"They do the math, and they know that parking alone costs about \$26 a day," he says. "By taking the bus, it leaves them money to spend on other things."

The riders Mr. Moser calls the "silver surfers" constitute the buses' third major market segment. These are retirees on fixed incomes.

The latter two groups, though, are harder to persuade to take the intercity bus than the youngsters, Mr. Schwieterman says.

"To them, there is still a stigma and the thought that you might have to sit next to a hard-core person," he says, adding that that's unlikely to happen because most ticketing is done online.

The Northeastern corridor is particularly ripe for bus travel because of its vibrant cities and the relatively short distances between them. The sweet spot, according to Mr. Schwieterman's research, is a bus trip between 175 and 300 miles.

"When the ride's more than six hours, the drudgery of the bus ride sets in," he says. "The strength is the short trip," particularly against the backdrop of hassle-heavy airports and occasional parking-lot conditions on the expressways connecting the big cities in the Northeast.

But, you might say, the buses have to use those same expressways.

To which Mr. Moser responds: "It's still a more relaxing way to travel because you're in charge of the driving."

However, Mr. Schwieterman says, this traffic unpredictability may be part of the reason the business clientele is not - literally - on-board yet.

"Arrival time is always an 'educated guess,' " Mr. Schwieterman says - which might not be good enough if you're trying to make an important business meeting.

Still, even business ridership is growing, Mr. Moser says, as companies are trying to save money in this troubled economy.

Mr. Moser says it's gratifying to know that, beyond making money, he and other bus operators are helping reduce greenhouse gas emissions by tens of thousands of tons each year by getting people out of their cars and into buses.

"It's the greenest form of travel," he says.

And this is another inducement to the green-conscious, tech-savvy, young urban dwellers who have helped make intercity buses newly chic.

"They're making a statement by taking the bus," Mr. Schwieterman says.

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EXHIBIT 11

The Washington Post

Back on the Bus

We Got on Board, Too, To See What's Driving the Boom

By Andrea Sachs
Washington Post Staff Writer
Sunday, August 30, 2009

There is a new generation of bus riders traveling between Washington and New York, and these are some of their faces: an FBI lawyer, a Northwestern University undergraduate, a Brooklyn uncle, a government consultant, a preschool teacher from California and a London lad working at a summer camp in New Jersey. You can also see my visage pressed against the large tinted window, and I'm sure I've seen yours, too. We are a tribe, and we're growing.

The bus is making a comeback. That once maligned mode of transportation -- search terms: Greyhound, runaways; Chinatown, fire -- is becoming the au courant form of travel along the Northeast corridor. All the early adopters are taking it. But so, too, are people on budgets, Washingtonians who loathe the 233-mile drive to the Big Apple and bons vivants with an itch to head for New York at midnight to catch the after-hours parties.

The appeal is prodigious. The buses are cheap, convenient, well kitted-out and eco-approved. They are relatively hassle-free, especially because someone else is stuck navigating traffic. Baggage rules are more lax than on other forms of transportation, and there are no sneaky taxes or rules against carrying liquids, unless they have alcohol content. In addition, your pals, relatives and co-workers are hopping aboard. Do you really want to be left at the curb?

"I take it all the time. All my friends do, too," said Alan Henderson, a Howard University student who was waiting in line recently to board a Megabus in New York.

Between 2005 and 2007, according to the American Bus Association, nationwide ridership surged by 20 percent, increasing from 631 million passenger trips to 751 million. "We move about the same numbers as domestic [air] carriers each year," said ABA spokesman Eron Shosteck, a bus rider himself, "and more people in two weeks than Amtrak does all year."

As Shosteck put it, "This is Transportation 2.0."

On a more local level, new bus lines are popping up like wildflowers on a median strip: DC2NY (inaugurated July 2007), BoltBus and Megabus (spring 2008), Tripper Bus (February), Hola (July). The motor coaches form a dotted line from Dupont Circle to 15th

and K streets, over to the parking lot at H and Ninth streets, and south to Sixth and I streets in Chinatown. You can also trace the perimeter of Penn Station in New York and run out of fingers and toes counting the buses.

Despite outward appearances -- it's a bus, after all, with doors, windows, wheels, etc. -- no two are identical. They vary in amenities, service and style, pickup/drop-off locations and sometimes cost. Even on short-haul journeys, those distinctions matter.

To shake out the good from the bad, the comfortable from the dismal, I dedicated a month of my life to riding the buses to New York, boarding nearly a dozen to figure out what makes these vehicles go 'round and 'round -- or flat.

* * *

It was hard to nail down an exact count of bus lines. I initially found 10, but then an 11th (Hola) popped up, and then a 12th (MVP). Part of the confusion stems from the fact that some of the major lines oversee several brands (Greyhound co-owns Bolt with Peter Pan, for instance, and Megabus is a subsidiary of Coach USA); forge partnerships (Greyhound and Peter Pan); or go by multiple aliases (Chinatown buses). It was so easy back in my grandmother's day: skinny racing dog, infantile boy who can fly or Trailways.

Of the riders I met during my busathon -- and they were of all ages, professions and financial standings -- many said that the main factors they weighed in deciding which bus to take were price, location and times.

"I had five choices just for today," said Jonathan Kaspari, a 24-year-old transplant from Minneapolis who works at a Washington consulting firm. "For price and schedule, this was the right bus for me." That bus was Washington Deluxe. Cost: \$21 one way. Pickup in Dupont Circle and on 15th Street NW at the corner of K Street.

"When I went on the Internet, there were a ton of Chinatown buses," Julie Fishman, a 30-year-old West Coast teacher visiting East Coast friends and family, told me as we cruised along one Monday afternoon in a half-empty Hola bus. "I don't have a car, so location mattered most." Hola departs from Sixth and I streets in Chinatown and is one of the few buses to drop off near the Port Authority Bus Terminal in New York.

In the other camp are travelers who profess an unshakable loyalty to a bus line and can't be tempted away, even by the \$1 fares some lines offer, depending on availability. (If they do stray, they always come back.) "This is the bus company I started taking in 2007, and I have stuck with them ever since," said Chris Comis, a D.C. resident who works in the restaurant industry and rode DC2NY round-trip for a sandal-fitting on the Lower East Side. "I tried Bolt just to see what the other buses were like. See where I am now?"

And on the extreme edges are the in-the-field busologists who could write a thesis on the subject. Take Gabe Brotman, a Northwestern University student who was sitting on the top level of a double-decker Megabus one recent Sunday evening, returning to

EXHIBIT 12

The Washington Post

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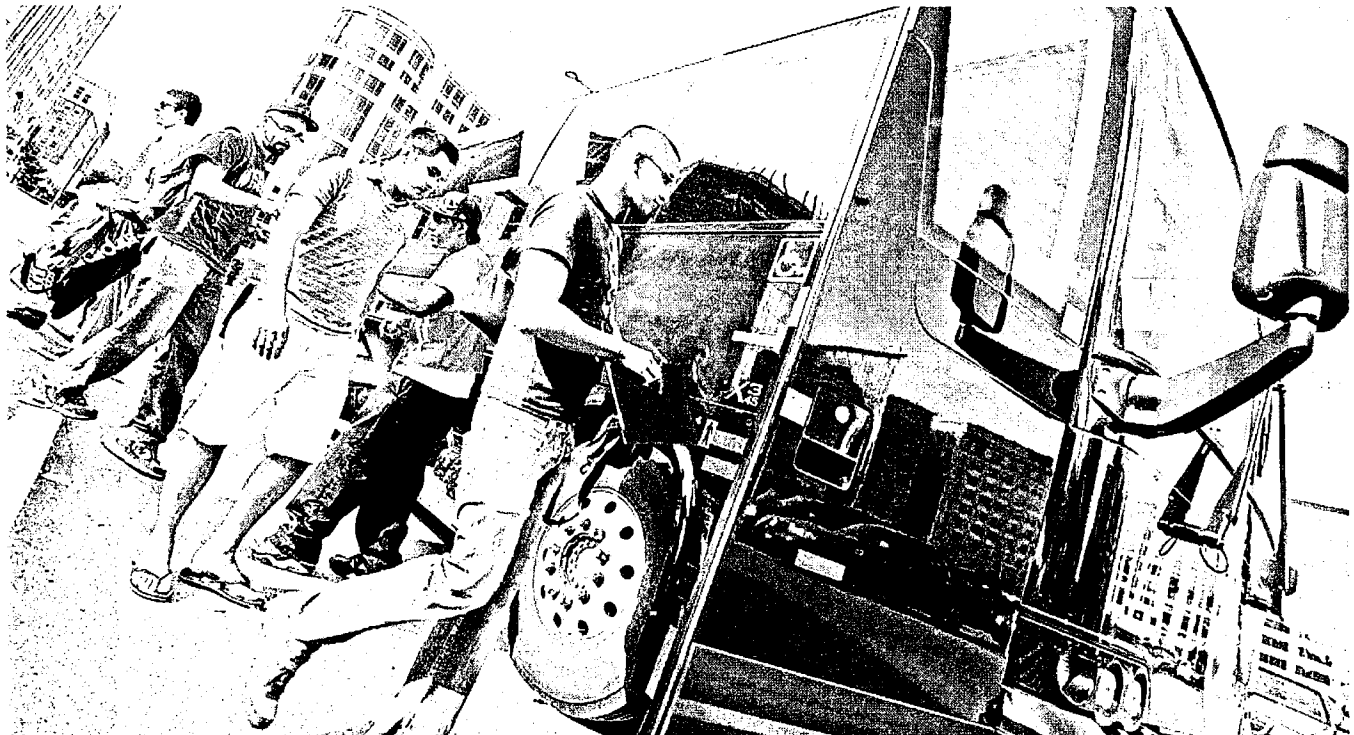
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Rolling With It The Best Bus for Your Buck

BOLT DC2NY GREYHOUND HOLA MEGABUS MVP NEW CENTURY TRIPPER VAMOOSE WASHINGTON DELUXE

You can't judge a bus by its exterior. Though they share the same route (Washington to New York) and mode of transportation (motor coach), the bus companies are vastly different. We should know: We hopped 10 coaches from 10 different lines, noting such details as pickup and drop-off locations, amenities and prices. We then combined the data with our experiences to formulate a bottom line and a ranking from one bus (skip it) to four buses (tops).



CARRIER STOPS IN DC STOPS IN NYC PRICE BOOKING POLICIES AMENITIES BOTTOM LINE

Bolt Bus

877-265-8287
boltbus.com



- Public parking lot at Ninth and H streets NW

- 33rd Street and Seventh Avenue, near Penn Station
- Sixth Avenue between Grand and Watts streets.
- (May stop at both N.Y. addresses.)

\$1-\$25 (walk-up price) one way, plus 50-cent booking fee

Book online or by phone, or pay cash curbside.
Guaranteed seat with a ticket. Rebook by phone up to 24 hours before departure; \$3 fee, plus any fare differential. No refunds on cancellations.

Free WiFi, outlets and extra legroom. Some of the buses have leather seats and seat belts. With Bolt Rewards, receive a free one-way trip for every eight one-ways.

The Greyhound-owned line is a **crowd favorite** because of the amenities, guaranteed seating and **easy boarding process**. (You can flash a record of your reservation on your tech gadget, for example.) One downside: The buses are frequently sold out at the last minute and during popular times.

DC2NY

202-332-2691
dc2ny.com



- 20th Street and Massachusetts Avenue NW in Dupont Circle
- 14th Street between H and I streets NW
- Bus stops at both D.C. locations per trip.

- West 34th Street between Seventh and Eighth avenues, near Penn Station.

\$28 one way, **\$50 round trip**; \$30 walk-up fare

Reserve online or by phone; cash payments for walkup. Seat guaranteed with a reservation. Reschedule for free online 24 hours before departure. No refunds.

Free WiFi, outlets and bottled water; movies and scheduled rest stops added on the basis of passenger votes. Rewards program offers lower fares, a more generous rescheduling policy and a free trip after eight rides.

Staff is very affable and sensitive to passengers' needs, such as **voting for onboard entertainment**. (My crew voted no for "The Office," "The Interpreter" or "Get Smart.") Very clean buses, and we drank up that free water. Our only wish is for later departure times: On many days, the last bus leaves the District at 5:30 p.m.

Greyhound

800-231-2222
greyhound.com



- 1005 First St. NE

- Port Authority, 625 Eighth Ave.
- Stops vary depending on schedules. For example, itinerary may include New Carrollton and Baltimore.

From \$20 one way

Book by phone, online or in the terminal. First come, first served. For a guaranteed seat and to pre-board, purchase a **\$5 priority seating ticket**. Nonrefundable-ticket holders pay \$15 to reschedule. No refunds

New buses have free WiFi, outlets, extra legroom, seat belts and cup holders. Road Rewards program offers such perks as **one free companion pass with a paid full-fare ticket** after you purchase six oneway trips.

We relished the new buses, which reminded us of a **swank VIP lounge**, but disliked having to be at the terminal an hour in advance to grab a seat. (When we flouted the rule by a half-hour, we were too late to get a seat and ended up on a dirty Peter Pan bus.) We also cringed at the craziness of the terminal and at being **wanded at the Port Authority**.

Hola

202-509-9600
holabus.com



- 622 I St. NW
- 260 N. Washington St. in Rockville

- 612 Eighth Ave. in Times Square
- 18 Allen St.
- Stops in Union City, N.J., if requested.

\$20 one way, **\$35 round trip**; \$25 one way, **\$45 round trip** for Rockville (includes D.C.)

Book online or pay cash on the bus. Call 24 hours before departure to reschedule for free. No refunds.

Free WiFi and satellite TV allegedly.

We were smitten with the logo (a grinning pandalike bear with a halo) but lukewarm about the actual bus. The driver did not know how to operate the WiFi, the trash bags needed to be emptied and an image on the TV just flickered. At least the vehicle had a **new -bus smell**

MegaBus

877-462-6342
megabus.com/us



- Public parking lot at Ninth and H streets NW

- Seventh Avenue and 28th Street.
- Stop at the White Marsh Park & Ride north of Baltimore.

\$1, \$3, \$8, \$10, \$15, \$19 or \$23 one way.

Book online or by phone; walk-up purchases by cash and credit also available. Must reschedule more than 24 hours before your original departure; charge is \$1 plus price differential. No refunds.

Free WiFi, **double-decker fleet**; power outlets being added. Promotions offered to Facebook friends and Twitter followers.

Megabus, a subsidiary of Coach USA, is a mega workhorse, offering **more than 20 round trips a day**. When Bolt is booked up, many people default to Megabus. The ride is consistently smooth, but the boarding process in New York is hellish, with **higgledy-piggledy lines**, hordes of confused riders and too few employees on hand. A little signage could go a long way.

MVP

888-687-2871
mvpbus.com



- 610 I St. NW

- West 31st Street between Seventh and Eighth avenues, near Penn Station.

\$20 one way, **\$35 round trip**

- Stops in Baltimore, at 1910 N. Charles St.

Book online or buy at the bus stop (cash only). Seats guaranteed with online purchase. Pay \$5 to reschedule; for Washington, call 202-408-1128, and for New York, visit the office across the street from the pickup spot. No refunds.

Movies and free WiFi, with a caveat.

Our high hopes for MVP crashed when we were put on a chartered bus instead of the company's own. (Hindsight lesson: MVP runs its own vehicles Monday-Thursday but uses others on weekends.) Our non-MVP bus was pretty dismal: No WiFi, **broken reading lights** and the restroom was like an indoor outhouse, unclean and **lacking toilet paper** and hand sanitizer. Now we know.

New Century Travel

202-789-8222
2000coach.com



- 513 H St. NW

- 86 Allen St.

\$20 one way, **\$35 round trip**

- Stops at the Baltimore Travel Plaza
- Depending on the schedule, stops in Philadelphia and Brooklyn.

Book online or purchase tickets in cash at the H Street office. No rescheduling or refunds.

Some buses **may play movies**.

You could promise us the entire film oeuvre of Jackie Chan and we still wouldn't get on the bus. The boarding was unclear — we were instructed to board the Philly-bound bus, but then what? — and the ride was **harrowing from start to finish**. We want our 20 bucks back!

Tripper Bus

877-826-3874
tripperbus.com



- 1823 N. Moore St. in Arlington

- 151 W. 34th St.

\$1, \$5, \$10 or \$25 one way

- 4801 Edgemoor Lane in Bethesda

Book online or by phone; walk-ups pay cash. Guaranteed seat with a reservation. No charge to reschedule. Must cancel at least 12 hours before departure time; tickets nonrefundable, but **credit will be held for future use**.

Free WiFi and bottled water; outlets. With the frequent rider program, travel four times and get **one trip free**.

Suckers for **free cold water** on a hot day and topnotch customer service, we easily fell for Tripper. Before leaving New York, owner Betty Unger boarded the bus to make sure we were all happy and hydrated. Halfway through the trip, we **e-mailed HQ** to alert them to the toilet paper situation (none). The company messaged back an answer, and the bus driver later showed us the TP stash. Our only wish is for more frequent service.

Vamoose

877-393-2828
vamoosebus.com



- 7490 Waverly St. in Bethesda

- 31st Street and Seventh Avenue, near Penn Station.

\$30 one way

- 1801 N. Lynn St. in Arlington

- Typically stops in Bethesda and Arlington.

Book online or by phone, credit cards only. Call to **reschedule for no charge**. No refunds on cancellations, but ticket will remain on hold and applied to future travel.

With frequent-rider program, travel four times and receive a free trip. Company is also launching Vamoose Gold, a more **luxé service for about \$50 one way**.

The company wins points for **personable customer service** and clean vehicles, but its buses aren't very 21st century. The **fare is also the highest** of the lot.

- 441 New Jersey Ave. NW; 15th Street NW,

- In Brooklyn: 155 Empire Blvd.

\$21 one way, **\$40**

Reserve online (no payment necessary)

Free WiFi; outlets on select vehicles.

Convenient pickups in Washington and helpful

Washington Deluxe

866-287-6932
washny.com



between K and L streets; 1333 19th St. NW; 4530 40th St. NW

- Bedford and Park avenues
- 203 Havemayer St.
- In Manhattan: 303 W. 34th St. at Eighth Avenue, near Penn Station
- 122 Allen St. at Delancey Street.
- Stops at D.C. pick-up locations.

round trip, based on Sunday-Friday travel; \$25 each way on Saturday

until you board the bus), or pay by credit card by phone. Walk-ups accepted. Seating guaranteed with a reservation. To reschedule, go online 24 hours before travel or call for assistance. No charge. No refund but can apply unused ticket for future travel.

Collect four roundtrip coupons and receive a fifth one-way ride for free, or collect eight one-way tickets for a free ninth.

customer service. The buses don't depart as late as some of the other companies (last one is 7:30 p.m.), but we'd happily **get on the road earlier** for this ride.

Buses come with air conditioning and restrooms, but sometimes the companies charter vehicles, so you might not get all the other promised fixings. No trip is ever the same, due to the quixotic nature of traffic and passengers.

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EXHIBIT 13


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Megabus.com Recognizes Millionth Customer

CHICAGO (May 1, 2008) - Megabus.com, a low-cost, intercity express bus service with fares as low as \$1 via the Internet, announced today it has successfully served one million customers in the United States during the first two years of service.

Megabus.com celebrated its success by recognizing millionth customer Dana Bellers of St. Charles, Mo., a suburb of St. Louis. Bellers, 27, is an employee at Wachovia Securities in St. Louis.

Megabus.com recognized Bellers during a ceremony upon her arrival at the megabus.com Chicago stop near Union Station. She was given a Dell notebook computer and two Chicago Double-Decker/Trolley Tour tickets. All travelers on Bellers' bus also received two Chicago Double-Decker/Trolley Tour tickets as a token of appreciation from megabus.com.

"Megabus.com is the inexpensive, convenient and safe way to travel on my own," said Bellers. "The Online reservation system is easy to use and fares are always lowest compared to rail, air and car. I am honored to be recognized as the millionth customer and look forward to booking additional megabus.com trips Online with my new lap top."

Megabus.com began offering service to and from Chicago and eight other Midwest cities for as low as \$1 dollar in April 2006. Since the initial launch megabus.com has expanded to a total of 17 Midwest cities, seven West Coast cities and most recently eight East Coast cities.

"The overwhelming popularity of megabus.com's innovative, express bus service prompts us to keep expanding and offering our service to as many customers as possible," said Dale Moser, president and chief operating officer of megabus.com. "We're excited to have reached our millionth customer and look forward to serving future travelers with the same passion and exceptional value-for-money our customers have come to expect."

Of the one million customers served by megabus.com, 79 percent have used megabus.com as an alternative, instead of driving, using the train and/or flying, a trend that is steadily growing according to Joseph Schwieterman, director of the Chaddick Institute for Metropolitan Development and professor of public service management at DePaul University.

"The public is responding with considerable enthusiasm to the express services provided by megabus.com and other low-cost providers," said Schwieterman "After years of decline, the industry is once again poised for growth."

"We understand that customers made megabus.com successful and will keep us successful," said Moser. "We want to take any opportunity available to thank them for that."

Booking for megabus.com travel is done via the Internet at www.megabus.com. The Web site provides information on routes and arrival and departure times. Passengers can quickly book their travel and purchase tickets from the comfort of their home, office or wireless handheld device. The Web site is in English and Spanish. Customers are encouraged to book early to secure fares as low as \$1 and will pay competitive fares the closer they book to the day of departure.

About megabus.com

Megabus.com is the first intercity, express bus line dedicated to bringing high-quality, low-cost travel options to eight East Coast cities, 17 Midwest cities and seven West Coast cities for as low as \$1 via the Internet. Service for megabus.com operates daily. Fares shown are one-way and include all government taxes. Since its launch on April 10, 2006, megabus.com has served one million travelers. East Coast cities served beginning May 30 include: New York; Atlantic City, N.J.; Baltimore; Boston; Buffalo, N.Y.; Philadelphia; and Washington in the United States; and Toronto. Midwest cities served include: Ann Arbor, Mich.; Bloomington-Normal, Ill.; Chicago; Champaign, Ill.; Cincinnati; Cleveland; Columbia, Mo.; Columbus, Ohio; Detroit; Indianapolis; Kansas City, Mo.; Madison, Wis.; Memphis, Tenn.; Milwaukee; Minneapolis; St. Louis and Toledo, Ohio. West Coast cities served include: Las Vegas; Los Angeles; Oakland, Calif.; Millbrae, Calif.; San Diego; San Francisco; and San Jose, Calif. Visit www.megabus.com for additional service routes to and from the listed cities.

Chicago-based megabus.com is a subsidiary of Coach USA. Paramus, N.J.-based Coach USA owns and operates more than 20 local companies in North America, some that have been in business for more than 35 years, which operate scheduled bus routes, motor coach tours, charters and sightseeing tours.


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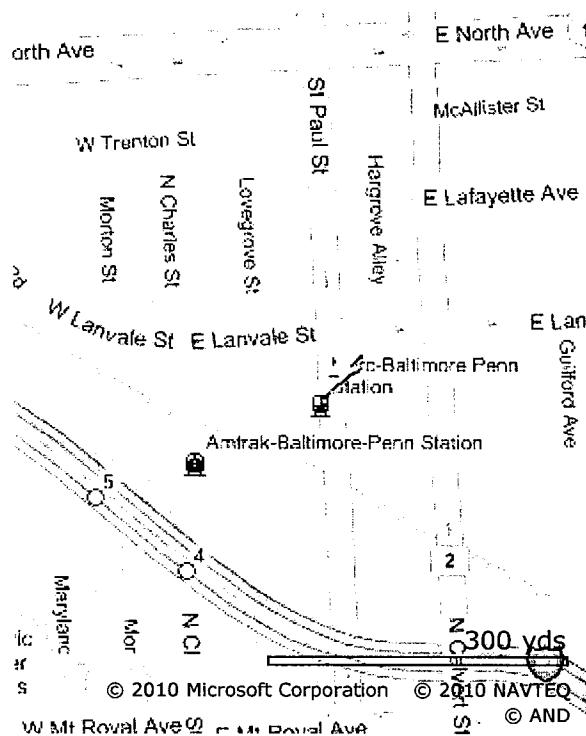
EXHIBIT 14

[Buy Tickets](#)[Where We Go](#)[Bolt Rewards](#)

11/11/2010 11:11 AM

11/11/2010 11:11 AM

For your convenience, Bolt Bus provides daily express service from Washington to New York.



Baltimore

Number of Stops: 1

Baltimore-Marc Penn Station (1610 St. Paul)
1610 St. Paul St., Baltimore, MD 21202

Description: This is an outdoor stop located on St. Paul St. approximately 300 ft. south of E. Lanvale & St. Paul. There is affordable parking available off E. Lanvale.

Connections: Penn Station

Buy Tickets

Boston

Greenbelt

New York

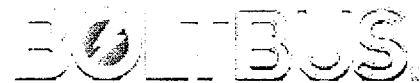
Cherry Hill

Philadelphia

Washington

Once your online purchase is complete, you'll be given a confirmation number with a boarding group. When your group is called, it's your turn to board. Passengers who book tickets online are guaranteed a seat; however, they must arrive 15 minutes prior to departure or their seat may be sold to a standby passenger. Standby passengers who purchase tickets at the bus will board last.

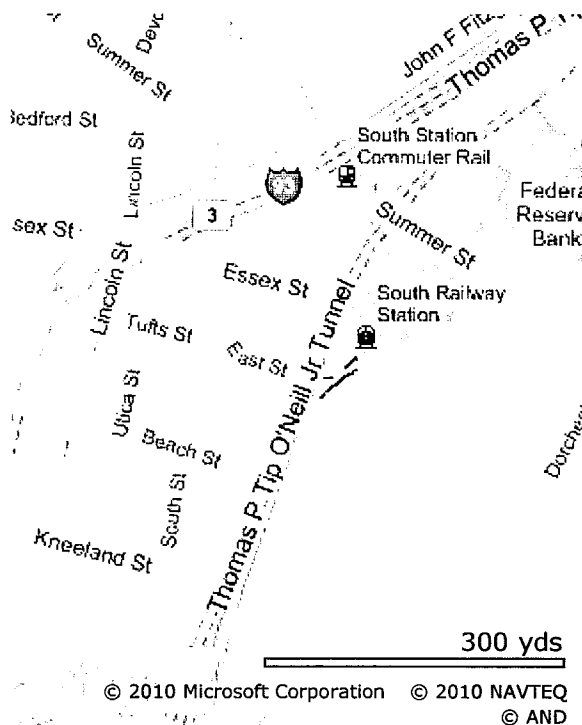
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[Buy Tickets](#)[Where We Go](#)[Bolt Rewards](#)

Where We Go

Where We Go - Boston

For your convenience, Bolt Bus provides daily express service from Washington to New York.



Baltimore >

Boston >

Number of Stops: 1

Boston South Station -- Gate 9
700 Atlantic Ave. Boston, MA 02110

Description: This is an indoor stop at the Boston-South Station Bus Terminal, adjacent to the Amtrak station. Proceed directly to Gate 9 for boarding.
Connections: MBTA, red and silver lines

[Buy Tickets](#)

Greenbelt >

New York >

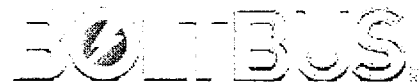
Cherry Hill >

Philadelphia >

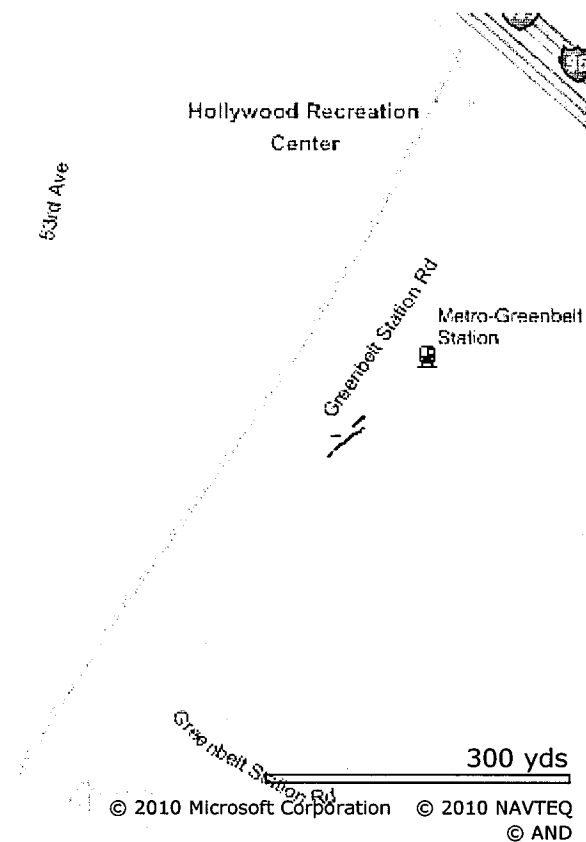
Washington >

Once your online purchase is complete, you'll be given a confirmation number with a boarding group. When your group is called, it's your turn to board. Passengers who book tickets online are guaranteed a seat; however, they must arrive 15 minutes prior to departure or their seat may be sold to a standby passenger. Standby passengers who purchase tickets at the bus will board last.

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For your convenience, Bolt Bus provides daily express service from Washington to New York.

[Baltimore](#)[Boston](#)[Greenbelt](#)

Number of Stops: 1

Greenbelt, MD Metrorail Intermodal Station
5717 Greenbelt Metro Drive

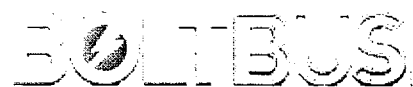
Description: Greenbelt Metrorail Intermodal Station. Passenger arriving via the Green Line or MARC will exit the train and proceed to the right towards the covered seating area marked "Boltbus". Passengers arriving by bus or private auto will enter the facility on Greenbelt Metro Drive and proceed to Bus Track "H". This will be on your left and there will be a Boltbus sign at this stop. There is all day short term parking available at this location for \$4.25 per day.

Connections: MARC, Green Line

[Buy Tickets](#)
[New York](#)[Cherry Hill](#)[Philadelphia](#)[Washington](#)

Once your online purchase is complete, you'll be given a confirmation number with a boarding group. When your group is called, it's your turn to board. Passengers who book tickets online are guaranteed a seat; however, they must arrive 15 minutes prior to departure or their seat may be sold to a standby passenger. Standby passengers who purchase tickets at the bus will board last.

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For your convenience, Bolt Bus provides daily express service from Washington to New York.



- Baltimore >
- Boston >
- Greenbelt >
- New York >

Number of Stops: 3

New York 33rd and 7th (Service to DC or Baltimore)

33 St. & 7 Ave NY, NY 10018

Description: This is an outdoor stop at the northeast corner of the intersection. The bus will stop in the designated bus stop area on 33rd Street in front of a Sbarro's Italian restaurant.

Connections: MTA subway lines A, C, E (8 Ave), 1,2,3 (7 Ave), B,D, F, V (6 Ave)

New York 34th and 8th by Tick Tock (Phil. or Bos.)

34 St. & 8 Ave NY, NY 10001

Description: This is an outdoor stop at the northwest corner of the intersection. The primary landmark is the New Yorker hotel and the Tick Tock Diner. Along 34th there are designated bus stops from the Tick Tock to the entrance of the Manhattan Center. This is where our bus will pickup.

Connections: MTA subway lines A, C, E (8 Ave), 1,2,3 (7 Ave)

New York 6th Between Grand & Watts (To DC or Phil)

Canal St. & 6 Av. NY, NY 10014

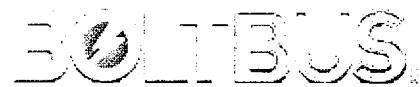
Description: This is an outdoor stop at the northeast corner of the intersection a little north on 6th.

Connections: MTA subway lines A, C, 2, 3

[Buy Tickets](#)

- Cherry Hill >
- Philadelphia >
- Washington >

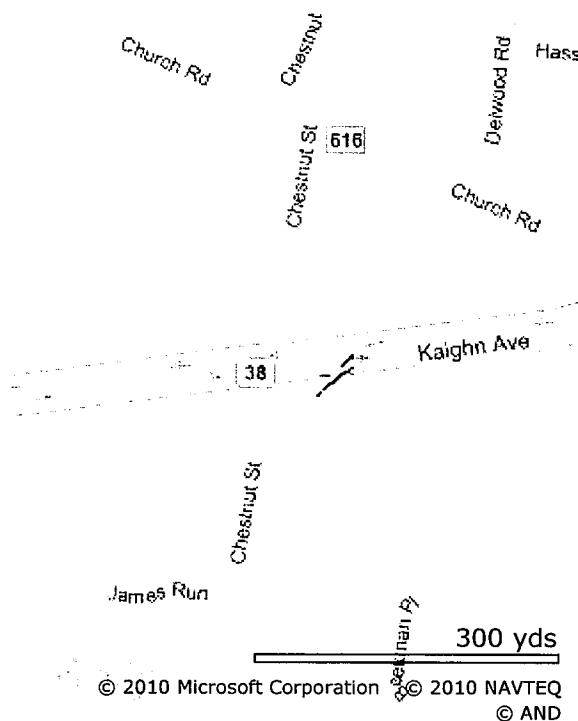
Once your online purchase is complete, you'll be given a confirmation number with a boarding group. When your group is called, it's your turn to board. Passengers who book tickets online are guaranteed a seat; however,

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Philadelphia - Cherry Hill Mall

Philadelphia - Cherry Hill Mall

For your convenience, Bolt Bus provides daily express service from Washington to New York.



- Baltimore >
- Boston >
- Greenbelt >
- New York >
- Cherry Hill >

Number of Stops: 1

Philadelphia - Cherry Hill Mall
Route 38 Cherry Hill, NJ 08002

Description: N.J. Transit Bus Shelter - Route 38 East at Cherry Hill Mall Drive-in front of the Cherry Hill Towers Apartment Complex. Your car "will" be towed if you park at the Apartment Complex.

Connections: New Jersey Transit

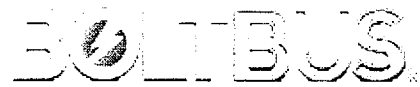
Buy Tickets

- Philadelphia >
- Washington >

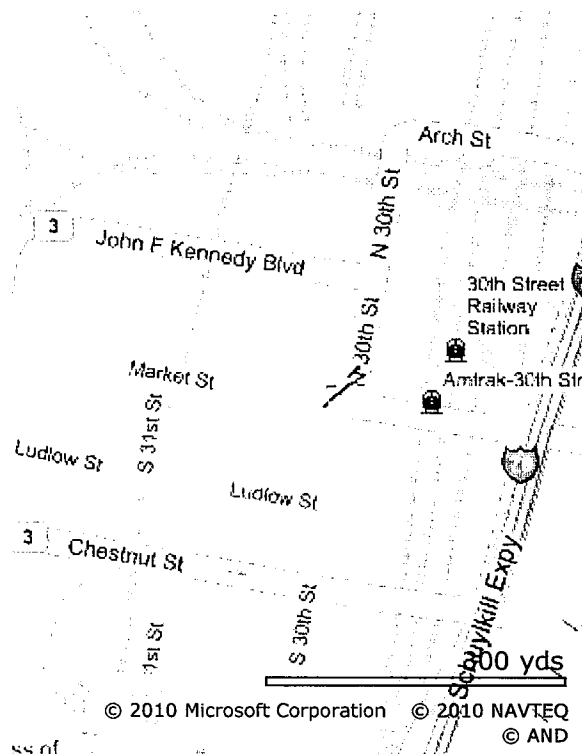
Philadelphia - Cherry Hill Mall

Once your online purchase is complete, you'll be given a confirmation number with a boarding group. When your group is called, it's your turn to board. Passengers who book tickets online are guaranteed a seat; however, they must arrive 15 minutes prior to departure or their seat may be sold to a standby passenger. Standby passengers who purchase tickets at the bus will board last.

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[Buy Tickets](#)[Where We Go](#)[Bolt Rewards](#)

For your convenience, Bolt Bus provides daily express service from Washington to New York.



- Baltimore >
 - Boston >
 - Greenbelt >
 - New York >
 - Cherry Hill >
 - Philadelphia ✓
- Number of Stops: 1

Philadelphia 30th between Market & Chestnut
30th & Market St. Phil., PA 19104

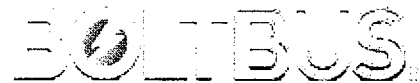
Description: This is an outdoor stop in the middle of the block across the street from the Post Office. A BoltBus sign on a light pole marks the waiting point. Restrooms and food available at 30th Street Station
Connections: Market St. Line, SEPTA subway-surface trolleys

[Buy Tickets](#)

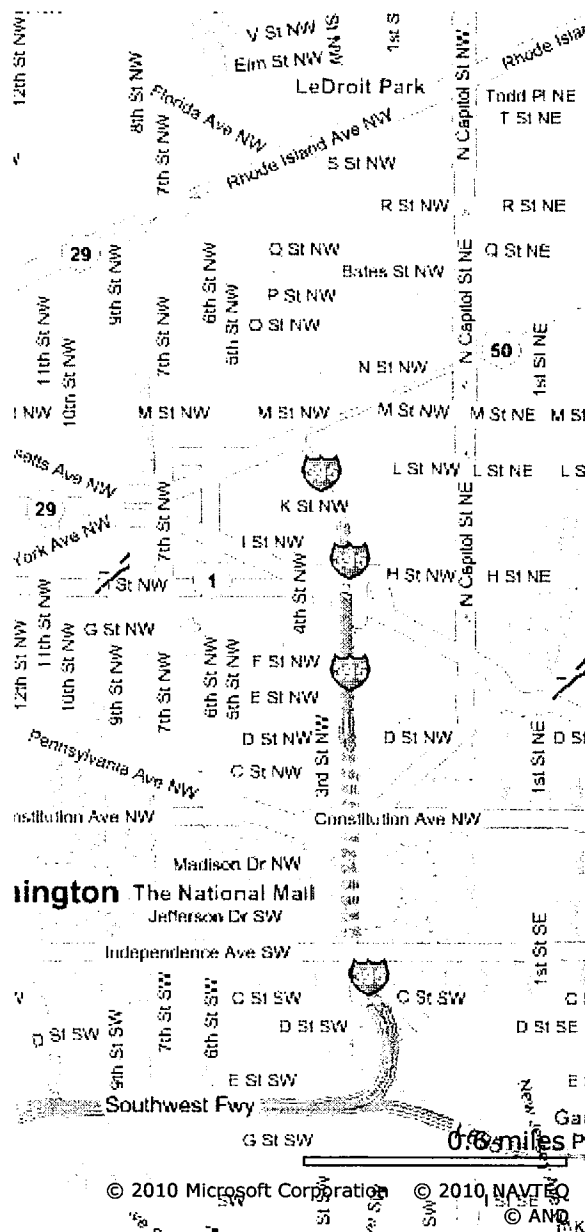
- Washington >

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For your convenience, Bolt Bus provides daily express service from Washington to New York.



Baltimore >

Boston >

Greenbelt >

New York >

Cherry Hill >

Philadelphia >

Washington >

Number of Stops: 2

Washington (Union Station), DC

50 Massachusetts Avenue, N.E.

Description: We are located inside Union Station on the Mezzanine Level of the Union Station Parking Deck. If you enter this facility from the front entry of Union Station, proceed through the Atrium past the food court until you see the escalators, proceed up the escalators to the mezzanine level, our staging area will be to your immediate left. Parking is available at Union Station with entry located off of H Street, N.E. Call 202-898-1950 for information on rates and availability.

Connections: Metro (Red Line)

Washington, D.C. 10th St. & H St. NW

North of 700 10th St. NW at the Old Convention Center parking lot

Description: We are located in the parking lot of the Old Convention Center directly across the street from the Grand Hyatt Hotel on Bud Doggett's Way. Just follow the blue/green sidewalk north towards New York Ave, we're at the second pavilion. There's a 4ft high orange Boltbus sign at this location. There's artwork on both sides of the walkway.

Connections: Gallery Place / Chinatown Metro (Red / Yellow / Green Lines) and Metro Center (Red / Orange / Blue Lines)

[Buy Tickets](#)

Once your online purchase is complete, you'll be given a confirmation number with a boarding group. When your

CERTIFICATE OF SERVICE

I hereby certify that I have this 3rd day of May 2010 served a copy of the foregoing
Petition to Reopen by regular mail to the following parties of record:

Daniel R. Barney
Scopelitus, Garvin, Light, Hanson & Feary
1850 M Street, N.W., Suite 280
Washington, DC 20036-5804

Jeremy Kahn
Kahn and Kahn, Attorneys at Law
1730 Rhode Island Avenue, N.W., Suite 810
Washington, DC 20036

Director of Operations
Antitrust Division
U.S. Department of Justice
601 D Street, N.W., Room 1013
Washington, DC



David H. Coburn