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June 1, 2010

BY ELECTRONIC FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, DC 20423-0001

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

Dear Ms. Brown:

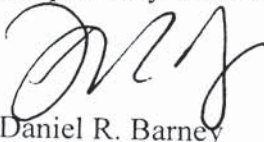
Greyhound Lines, Inc. and Peter Pan Bus Lines, Inc. respectfully object to the filing by Coach USA, Inc. and Megabus Northeast, LLC ("Megabus") in the above three Surface Transportation Board dockets on May 28, 2010, of a nine-page letter ("Megabus Letter") replying to the Opposition [Reply] of Greyhound Lines, Inc. and Peter Pan Bus Lines, Inc. to Megabus's Petition to Reopen Approval of Fourth Amendment. While purporting (at 1 n.1) to "clarify the record" in light of alleged "mischaracterization of their Petition," the Megabus Letter does little more than repeat the (still-erroneous) arguments advanced in the Petition. A desire to repeat does not rise to the "good cause" required in order to overcome the Board's rule that "[a] reply to a reply is not permitted" (49 C.F.R. § 1104.13(c)). See *East-West Resort Transp'n, LLC, and TMS, LLC D/B/A Colorado Mtn. Exp. – Pet. for Decl. Order – Mot. Car. Transp'n of Passengers in Colo.*, No. MC-F-21008 (S.T.B. served Apr. 8, 2005) (where a reply to a reply is submitted "on the ground that the record is incomplete due to certain representations made in [the other party's] reply," the submitter "has not shown good cause to allow the filing of a reply to a reply"). Accord *Norfolk So. Ry. Co. and Alab. Great So. R.R. Co. – Pet. for Decl. Order*, Finance Dkt. No. 35196, slip op. at 2 n.3 (S.T.B. served Mar. 1, 2010).

In this instance also, the Board should conclude that "[t]he Board's rules preclude acceptance of a reply to a reply... [and that Megabus] has not provided sufficient reason for the Board to make an exception to this rule." See *Union Pac. R.R. Co. – Abandonment – in New Madrid, Scott, and Stoddard Counties, Mo.*, No. AB-33 (Sub-No. 261), slip op. at 2 (S.T.B. served Sept. 10, 2009). For the record, Greyhound and Peter Pan hereby reject the Megabus

Ms. Cynthia T. Brown
June 1, 2010
Page 2

arguments presented in the Megabus Letter as unfounded – for the same reasons set forth in our May 17, 2010 Opposition to the Petition.

Respectfully submitted,



Daniel R. Barney
Counsel for Greyhound Lines, Inc.



Jeremy Kahn
Kahn and Kahn
Counsel for Peter Pan Bus Lines, Inc.

cc: David H. Coburn, Esq., Counsel for Coach USA Inc. and Megabus Northeast, LLC
Director of Operations, Antitrust Division, U.S. Department of Justice

CERTIFICATE OF SERVICE

I certify that I have this 1st day of June 2010 served copies of the foregoing letter to Ms. Cynthia T. Brown, Chief, Section of Administration, Office of Proceedings, Surface Transportation Board, dated June 1, 2010, on the following by First Class Mail:

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