



The Honorable Pete Buttigieg  
Secretary of Transportation  
1200 New Jersey Ave SE  
Washington, DC 20590

October 3, 2022

Dear Mr. Secretary,

Thank you for your leadership in implementing the historic Bipartisan Infrastructure Law. This investment in our infrastructure comes as a critical time as the nation emerges from the COVID-19 pandemic and navigates ongoing supply chain and inflation issues.

The undersigned organizations, led by the Community Transportation Association of America's (CTAA), write today to bring awareness to a burgeoning crisis in the small bus industry that threatens the ongoing operations of rural, small-city, paratransit and non-emergency medical transportation providers across the nation. Today, the demand for small buses, particularly body-on-chassis vehicles, far outstrips supply with estimates of 20,000 small bus purchases currently backlogged.

We need your assistance in securing more chassis for the small bus marketplace so the trips to vital health care appointments (like dialysis); to congregate meal sites and grocery stores; to work and education; and to other social services that these types of buses typically serve can safely continue. In addition, the current environment creates an opportunity to promote flexibility, competition, and innovation by streamlining the procurement regulations for small buses.

Recent dialogue among transit agencies, state departments of transportation, bus dealers and bus manufacturers highlight the current state of the small bus marketplace:

- A survey of State Departments of Transportation (State DOTs) last month revealed that three quarters of State DOTs are feeling an unprecedented level of concern regarding standard vehicle replacements and maintaining a state of good repair,

with more than one-half of agencies having had a small bus purchasing contract or agreement terminated in 2022;

- Bus dealers predict the small bus backlog, nationally, to eclipse 20,000 in 2023, and expect full recovery of the market to take five to seven years;
- The largest small bus manufacturer currently has one of seven manufacturing facilities up-and-running, and can only meet 25 percent of demand; and
- Prices for these vehicles are running 30 percent to 70 percent above pre-pandemic levels.

With the Biden Administration's leadership in enacting the Infrastructure Investment and Jobs Act (IIJA), public transit providers have record levels of federal capital investment. However, the small bus manufacturing backlog and price inflation threaten to stifle the IIJA's impact on transit service delivery in communities across the country. The positive impact of the IIJA's generational infrastructure investment is surely threatened by this situation.

The undersigned transit industry partners are actively working together to collaborate and support each other throughout this challenging time. Working together, we have developed a number of potential solutions for your consideration, including:

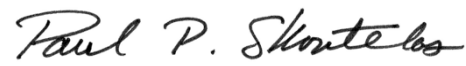
- Encourage chassis manufacturers, particularly Ford, to set aside units for vital public transportation and for small buses.
- Streamline current procurement regulations, with an emphasis on flexibility, because of the unprecedented nature of current small bus crisis. Use the vehicle backlog, nationally, to determine the timeframe for these procurement process changes.
- Expand the Federal Transit Administration's (FTA) proposed Buy America general nonavailability waiver for passenger vans (87 Fed. Reg. 43101) to include waiving Buy America requirements for small buses and vans when manufacturers are not able to guarantee delivery within 12 months or less of an order. Use this temporary waiver to incent manufacturers to locate production facilities in the United States.
- Offer clear guidance to FTA grantees on whether, when, and how to amend bus procurements or reprogram funds when vehicles as specified cannot be delivered under the terms of a procurement agreement.

In summary, we strongly encourage the U.S. Department of Transportation to help the public transit industry secure additional chassis for the small bus market. It is critical to our shared goal of ensuring that the Bipartisan Infrastructure Law provides unparalleled opportunities to all Americans. We would surely welcome any opportunity to discuss this critical subject further.

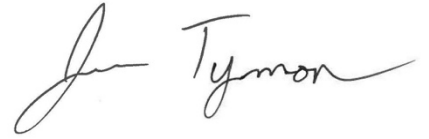
Sincerely,

Handwritten signature of Scott Bogren in black ink, featuring a stylized 'S' and 'B' followed by a horizontal line.

Scott Bogren  
Executive Director  
CTAA

Handwritten signature of Paul P. Skoutelas in black ink, written in a cursive style.

Paul P. Skoutelas  
President and CEO  
APTA

Handwritten signature of Jim Tymon in black ink, written in a cursive style.

Jim Tymon  
Executive Director  
AASHTO

Vermont Agency of Transportation  
Barre, VT

Nebraska Association of Transportation  
Providers  
Milford, NE

Tennessee Public Transportation  
Association  
Nashville, TN

Georgia Transit Association  
Marietta, GA

Transportation Association of Maryland  
Linthicum, MD

Prairie Hills Transit  
Spearfish, SD

TransAction Corporate Shuttles, Inc.  
Woburn MA

New Mexico Department of Transportation  
Santa Fe, NM

Call a Ride Service, Inc.  
Lewistown, PA

Utah State University Aggie Shuttle  
Logan, Utah

Southern Georgia Regional Commission  
Georgia

Starkville Mississippi State Area Rapid  
Transit  
Mississippi State, MS

Rogue Valley Transportation District  
Medford, OR

Ohio Department of Transportation  
Ohio

Washington State Transit Association  
Washington

River Bend Transit  
Davenport, IA

Arkansas Transit Association  
Arkansas

Mercer County Trade Trenton,  
NJ

Oklahoma Transit Association  
Oklahoma

Coordinated Transportation Solutions  
Trumbull, CT

Alabama DOT  
Alabama

Special Services Transportation Agency  
Colchester, VT

Tri-Valley Transit  
Middlebury VT

Claiborne County Human Resource Agency  
Port Gibson, MS

Alaska Mobility Coalition  
Anchorage, AL

Oklahoma Department of Transportation  
Oklahoma City, OK

California Association for Coordinated  
Transportation (CALACT)  
Sacramento, CA

Fairmont-Marion County Transit Authority  
Fairmont, WV

North Carolina Public Transit Association  
North Carolina

Kentucky Public Transit Association  
Kentucky

Illinois Public Transit Association  
Illinois

Minnesota Department of Transportation  
St. Paul, Minnesota

TPRG  
Cocoa Beach, FL

Community Transportation Association of  
the Northwest  
Oregon and Washington

Community Transportation Association of  
Virginia  
Radford, Virginia

Missouri Public Transit Association  
Missouri

Florida Public Transportation Association  
Tallahassee, FL

The Bus Coalition  
Nationwide

Michigan Public Transit Association.  
Lansing, Michigan

Michigan Transportation Connection, Inc.  
East Lansing

Upper Cumberland Human Resource  
Agency  
Cookeville Tennessee

California Department of Transportation  
California

River Cities Public Transit  
Pierre, South Dakota

Michigan Department of Transportation  
Michigan

SporTran  
Shreveport, LA

Maricopa Association of Governments  
Phoenix, Arizona

NJ Transit Corp.  
Newark, NJ

MDOT MTA  
Maryland

Siouxland Regional Transit System  
Sioux City, Iowa

South Dakota Department of  
Transportation  
Pierre, SD

Ionia Dial-A-Ride  
Ionia, Michigan

Virginia Department of Rail and Public  
Transportation  
Richmond, Virginia

MIDAS Council of Governments  
Fort Dodge, IA

Vermont Clean Cities Coalition  
Burlington, VT

Division of Multimodal Transportation  
Facilities, Division of Public Transit, West  
Virginia Department of Transportation  
Charleston, WV

South West Transit Association  
Fort Worth, Texas

Texas Transit Association - TTA  
Austin, Texas

MS Department of Transportation  
Mississippi

Southeast Vermont Transit  
Vermont

Gifford Health Care  
Randolph, Vermont

Community Transit of Watertown/Sisseton,  
Inc.  
Watertown, SD

Two Rivers-Ottawaquechee Regional  
Commission  
Woodstock, Vermont

Senior Solutions Council on Aging  
Southeastern, VT

Age Well, Inc.  
Vermont

Upper Valley Services  
Bradford, VT

Senior Solutions  
Springfield, VT

Mississippi Public Transit Association  
Natchez, Mississippi

Natchez Transit Regional Center  
Natchez, Mississippi

Natchez Senior Citizen's Multipurpose  
Center Natchez, Mississippi