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VIA E-FILING

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

**RE: STB Docket No. MCF-21117 – RESPONSE TO STB’S JULY 22, 2024
REQUESTS FOR FURTHER INFORMATION**

Dear Ms. Brown:

Applicants Bus Company Holdings Topco LP and Bus Company Holdings US LLC (collectively “Bus Company Holdings”), along with related co-applicants,¹ submit this letter to respond to questions raised by STB staff on a telephone conversation on July 22, 2024.

1. The organization chart identifies Hudson Transit Lines, Inc as acquiring Chenango Valley Bus Lines, Inc., but this acquisition is not discussed in the application.

The organization chart included this as an error. Shortline Transit LLC is acquiring both of these Coach USA Subsidiaries, as reflected in the corrected enclosed chart.

2. Please specify the states in which Elko Inc. operates.

Elko Inc. operates primarily in Nevada, with some services provided in Utah and California.

¹ Co-applicants are: Rockland Bus Lines, LLC; Shortline Transit LLC; Wisconsin Transit Lines LLC; Suburban Transit Lines LLC; Dillion’s Bus Lines LLC; OBC Lines LLC; Elko Bus Lines LLC; 1485832 B.C. Unlimited Liability Company; and Community Transport Lines LLC.

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3. Please clarify the ownership of 1485832 B.C. Unlimited Liability Company – the organization chart indicates that it is owned by Bus Company Holdings US LLC, but the application indicates that it is owned by Bus Company Holdings Topco LP.

A corrected chart is enclosed, which (consistent with the application) identifies 145832 B.C. Unlimited Liability Company as being owned by Bus Company Holdings Topco LP. Please note that, since the application was filed, the name of 145832 B.C. Unlimited Liability Company has been changed to Newcan Coach Company ULC. This new name is reflected in the enclosed chart.

4. Please clarify whether Renco exercises any direct control over any motor carriers and whether it should be an applicant based on the information contained in your July 12, 2024 submission.

Renco does not control any motor carriers. Upon consummation of, and as a result of the Transaction, Renco will not control day-to-day bus services or operations of the Acquisition Companies. It only has an ownership interest in the Acquisition Companies. Given that Renco will not control day-to-day bus services or operations of the Acquisition Companies, it does not believe that it should be an applicant. If the STB disagrees, please advise.

Please let me know if you have any questions.

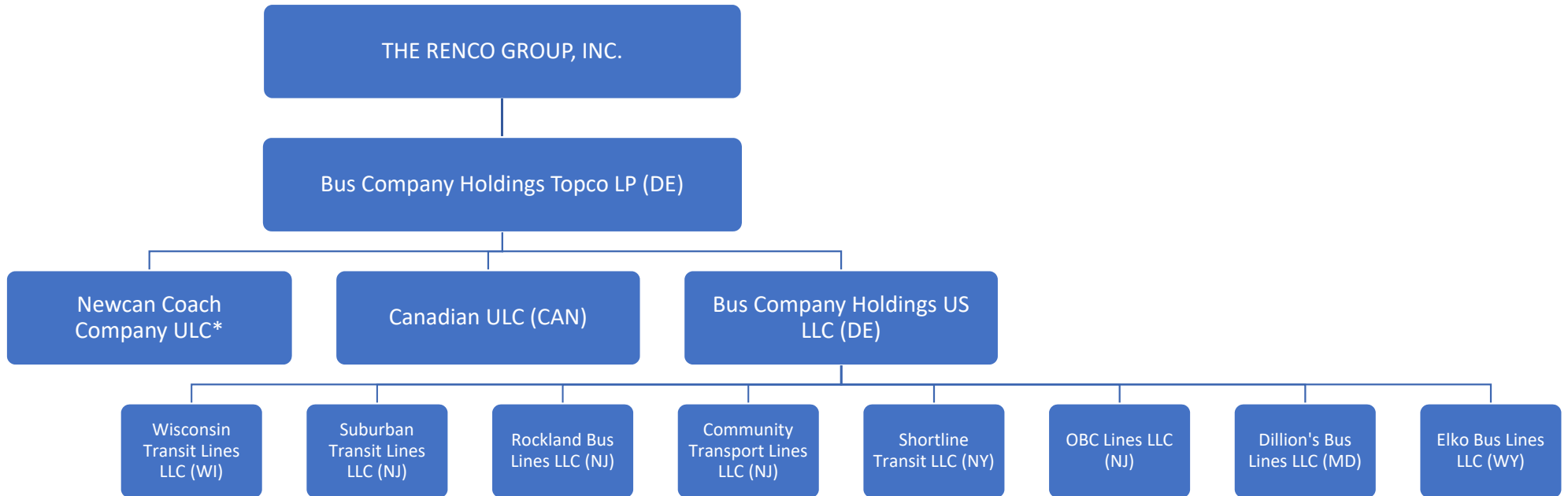
Respectfully submitted,



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*Attorney for Bus Company Holdings
Topco LLC, Bus Company Holdings US
LLC, Rockland Bus Lines, LLC; Shortline
Transit LLC; Wisconsin Transit Lines
LLC; Suburban Transit Lines LLC;
Dillion's Bus Lines LLC; OBC Lines LLC
Elko Bus Lines LLC; Community
Transport Lines LLC; and 1485832 B.C.
Unlimited Liability Company*

Applicant Organizational Chart



*Please note that this entity is the new name of 1485832 B.C. Unlimited Liability Company, which was identified in the application.

Chart of Entities Acquiring Coach USA Subsidiaries

